

Highway Response

Ref: 26/0237

Date: 08/05/26

PROPOSAL: CHANGE OF USE FROM EXISTING WINDSCREEN CENTRE TO INTERNATIONAL SUPERMARKET

SITE: 17-21 Wharf Road Newport NP19 8ET

Case Officer: Vicky Quinn

Highway Officer: Kevin Jackson

Highway recommendation:

Objection on highway safety and policy grounds.

Summary:

- The proposal is to convert a site with B8 consent which was previously used as a windscreen fitting shop to a specialist retail operation.
- A Transport Statement (TS) has been provided along with retail and planning assessments.
- The TS suggests that the proposal is 133sqm but this appears to be only the sales floor with the GFA being 285sqm
- Parking and trip generation are therefore underestimated.
- A parking survey has been undertaken but is considered flawed and not given much weight.
- Parking is complicated by restricted access and one-way systems, as well as severance issues.
- It is suggested that there would be no HGVs, deliveries would be out of hours and there would be trained banksman on site, none of which is accepted for a store of this size.
- Swept path assessments have been provided for inappropriate vehicles, but they only enter and leave they do not park, manoeuvre or unload as there is insufficient space.
- There are no drawings of the parking and servicing area, or information for customers to direct them to appropriate areas.
- There are no customer cycle facilities and no electric vehicle charging provision.
- The retail assessment suggests that custom would be diverted from similar size retail operations up to 2.6 miles away but concedes that the specialist nature of the shop would result in a quarter of the turnover being from outside the identified catchment area.
- As such the shop cannot be considered as a typical "corner store" in terms of trips generation and modal share.
- The TS suggests that the site is well served by footways and cycle/bus provision, but this is not fully accepted.

Highway Comments:

Accessibility.

The TS suggests there are continuous footway adjacent to the site. This is not accepted on the Wharf Rd elevation, where there is a wide and ill-defined access and pedestrians exposed to conflict with vehicles.

There are no useful cycle specific facilities adjacent to the site and the nearby crossings do not cater for cyclists. Whilst there are quiet residential roads adjacent to the site, they only facilitate an approach from one side and the level of parking raises issues for cyclist's safety.

Newport's standards require cycle parking for visitors and staff. Only provision for staff is proposed.

Trip generation

Some of the issue revolve around the areas used for the assessment. These are relevant to trip generation and parking calculations.

The application form and retail assessment state that the gross internal floor area is 285sqm. Standards for parking and trip generation are based on external gross floor area, which would be marginally higher, however the TS has relied on a figure of 133sqm. All calculations should therefore be increased by a significant factor.

Using 285sqm instead of 133sqm would increase the trip generation to 38 and 47 (rounded AM and PM peak respectively). Whilst it is accepted that there would be pass-by and diverted trips these are not all passing the front door or traversing Archibald St.

Furthermore, the customer parking is accessed via a significant detour through residential streets, and the frontage is a dual carriageway so pass-by is strictly only those going southbound on Wharf Rd. In addition, these are figures for the average

corner shop and it must be noted that this is a specialist offer, with 25% coming from outside of the typical catchment (ref retail need assessment).

We note that the extant use was calculated using 289sqm and there are differences in external/internal figures, but these points would make no difference to the overall conclusion.

In conclusion the trip rates adopted suggest that the additional traffic experienced on Archibald Street could be in the order of 50 vehicles per peak hour. It is difficult to make a straight comparison with the extant generation as it has two access points and we do not know how it operated. We would expect most of its generation to be using the front access, whereas the retail is entirely the rear access. (Staff would have to have arrived earlier).

Even assuming all traffic used the same route/access, this would be a significant nett increase and should trigger further assessment. It also suggests that parking demand should have been assessed at network peak hours.

Parking

No parking is demonstrated on the plans. It is however stated that customers would use the Archibald access and Staff would enter directly from Wharf Rd.

From Google earth it would appear there is space for 2/3 cars in the staff area. However, there is no safe egress or turning area. There is zero visibility for vehicles exiting and they would be reversing across a pedestrian route and private highway. This is not acceptable in terms of highway safety.

The customer area appears to have a space wide enough for four cars, but there is no space to manoeuvre into it or turn around to exit safely. The swept paths show a car drive in through the gate then drive out, as if it is a single space with a turntable fitted. Again, the egressing drivers have no visibility of pedestrians or vehicles.

The numbers above are likely to be reduced when electric vehicle charging and spaces for disabled drivers are added into the mix.

It should also be noted that it would be more convenient for customers to abuse the staff area or the adjacent private residential area, and this is what we would expect them to do. This would impact local residents in terms of amenity and all highway users in terms of safety. As there would be too much demand and no space to turn around, drivers would be forced to reverse across the (ill defined) pedestrian route and potentially into the dual carriageway.

Highways conclude there is no customer parking available, and all parking will be in the adjacent private road or on Archibald Street.

A parking survey has been provided but is given limited weight. It is based on an assumption that customers will park up to 200m away. The methodology used suggests this is appropriate for residents parking at home. We would not accept that it is reliable here for shopping. Firstly, much activity has been assumed to be "pass-by/diverted" so is time constrained and secondly because there will be shopping to carry.

Notwithstanding the 200m radius, the applicant correctly recognised that some streets do not represent a driveable route (See Lambeth Methodology) and excluded Oxford Street. They also excluded roads on the other side of Wharf Road recognising the severance issue. They included Phillip Street, which we would suggest has all the same issues as Oxford Street and should be excluded.

Photos and plans of spaces have been included in the report to substantiate the findings; however, we would not fully accept the capacity calculations as they are not checkable, and our assessment suggests less capacity.

More importantly the applicant has simply added all the available lengths then divided by 5 to calculate the unused capacity. This means for example an 8m space and a 2m space would appear to provide 2 car spaces when in fact it would only be one.

Taking a pragmatic approach, we consider Figure 2 (survey 1: 10 'til 11 AM) shows 6 available spaces (plus two on a junction and 8 on Phillip St) not 18 as recorded in the report.

Figure 3 (Survey 2: 3 'til 4pm) shows 10 spaces (with nine more on Philip that are not accepted) not 22 as claimed.

Figure 4 (Survey 3: 6-'Til 7 PM) shows 3 acceptable spaces (plus 4 and one on a turning head/junction on Phillip) not 9 as suggested

On that basis, we would consider the parking stresses much higher than the TS suggests. This is an issue in terms of circulation and driver behaviour but also raises concerns with regard to the reliability of a “snapshot” of a single day. The survey is not statistically significant, and the methodology requires additional days and times to give any confidence in the results.

In addition to more days, the survey should have covered other time periods. Peak trip generation is identified as 8-9AM and 5-6PM and these times have been surveyed. However peak parking stress will be when most residents are at home. The assessments should therefore have considered 7-8AM and 6-7PM as well. The trip generation (and resultant parking demand) is slightly lower, but the resident parking demand is likely to be much higher.

Given stresses up to 95% on Archibald in the evening with the potential to increase further as more residents return home, and in excess of 85% at other times, Highways consider the parking to be likely to cause safety or amenity issues.

In conclusion Highways consider the surveys do not provide sufficient information or confidence in the applicant's conclusions. Additional days and times are needed before a judgement can be made.

As well as parking stresses the assessment should consider the parking SPG, which requires 2 commercial vehicles plus 1 car space per 40sqm. This equates to 7 car spaces and 2 commercial spaces. No safe and practical parking is proposed or detailed and the proposals are contrary to the parking and servicing policies.

To facilitate servicing it is also proposed to reduce on street parking using double yellow lines (see below)

Servicing

The store would operate as a small-scale independent unit. They would have no control over the fleet of their suppliers. Also, much of the merchandise originates abroad and is likely to be transported in large vehicles for efficiency. It is therefore not accepted that there would only be out of hours deliveries or that there would be no HGV use. Furthermore, there would be no qualified banksman to guide them and if the shop staff guided them they would have to wait for someone to be available, whilst they block the road completely. The suggested mitigation/management is therefore given no weight.

Whilst the route through the residential streets would be tight for HGVs it is possible and vehicles up to the typical RCV size (11m) could negotiate it. However, the swept path for the access has been tested only for a vehicle less than 6m in length.

The tests show it driving in and driving out in forward gear but there is clearly no possibility of it or anything larger turning in the space. Best case would be it reverses in and drives out putting pedestrians at risk as it crosses the footway. However, this would require it to overhang the footway to gain access to the rear doors. Clearly this is not acceptable in terms of safety or amenity.

It is clear that an unsuitable vehicle has been partially tested and cannot service the site. It is likely that much larger vehicles would frequent the premises, probably 8 or 10m long should be anticipated.

It should also be noted that for any vehicle movements the application relies on double yellow lines adjacent to the access.

Traffic Regulation Orders (TROs)

The TS states that double yellow lines would be applied adjacent to the access. It does not show the precise location, and they are not shown on any plans. This would further reduce the available parking on Archibald St. but would facilitate easier movement for vehicles and slightly improve vehicular visibility.

TROs require a lengthy process which involves advertising, justifying the scheme and dealing with objections. The justification can only be made on safety grounds. Anybody can object and unless they withdraw the objection, they could prevent the Order being made. The costs would be recoverable from the applicant, but the outcome is not guaranteed, and they cannot therefore be conditioned. A s106 would be necessary to secure payment unless it is made in advance.

Given a loss of parking and no current Highways' support it appears unlikely any TRO application would be successful. On that basis the access would remain impractical and unsafe.

Access Design & Visibility

Both accesses must meet current visibility requirements. The TS states that they would be improved, but they currently do not and no scheme has been provided. The requirement is 2.4x25m and 2m x2m at 600mm

Both access points are flanked by high walls that prevent any pedestrian visibility at all.

No visibility splays have been provided for the “staff” entrance, but it is clearly not compliant with the pedestrian or vehicular requirements.

Splays have been provided for vehicular visibility for the “customer” access, but these are incorrect and are shown through walls and third-party land.

It may be possible to improve the visibility splays but with no scheme proposed and parking / servicing not demonstrated, Highways can only object. Any improvement would likely require the removal of large sections of wall and relocation of the access.

The trip generation calculations suggest that a footway crossing would not be appropriate and a bell mouth access with tactile paving would be more appropriate if suitable parking provision were proposed. In any event a footway crossing is not appropriate for a service access and would not carry the weight.