

Highway Response

Ref: RECON 26/0237

Date: 22/05/26

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 maintained.

Highway Comments:

Following receipt of a draft technical note from the transport consultants, we respond as follows.

We note that the document is only draft status and more importantly it proposes actions (such as providing the information that should have accompanied the application) but doesn't actually take matters forward.

For ease of reference and brevity we have reproduced the headings from a summary table within the document and added comment.

Heading	Response	Proposed Action	Highway's response
Floorspace / trip generation	A sensitivity test can be presented using 285sqm GIA, while maintaining that the 133sqm sales area is the principal customer-facing trip generating element.	Provide amended trip generation sensitivity test.	The area used is simply wrong this is not a sensitivity test. The figures we provided are based on TRICs, there is no "uplift". This is basic information that has not been provided correctly. Parking standards and TRICs do not rely on public shop floor/area. The amended submission should also consider pass-by and diverted trips in more detail as the development is not directly accessed from the major road. It should also be noted that trips do not distribute themselves evenly over any hour and the impact is on minor residential roads, not the principal roads. All of the trips are new to Archibald and adjacent minor streets. An increase of 30 movements is therefore sufficient to generate a need for further consideration of the impacts.
Parking survey methodology	The 200m Lambeth methodology is appropriate for urban on-street parking assessment and was applied conservatively with severance and Unsuitable streets considered.	Provide optional addendum using discrete-gap capacity calculation if required.	The methodology suggests 200m for residential development not shopping trips. It also states that routes must be driveable. That means not convoluted or requiring multi point turns. Discrete gap information should be provided and additional areas removed from the study. A lack of adjacent space leads to inconsiderate and unsafe parking practices.
On-site parking layout	The principle of staff/customer parking is acceptable but should be shown more clearly.	Submit revised layout showing parking, disabled bay, EV, cycle parking, servicing and signage.	Again, really basic information that has not been provided. Previous iterations of this application have failed to provide a workable solution, therefore this cannot progress without site plans. The areas are not considered acceptable at this stage without layout

			and swept paths. What is acceptable is having separate areas for the public. However, this is not compatible with service vehicles reversing amongst them. We could accept staff amongst service vehicles.
Access and visibility	Archibald Street visibility has been assessed on the basis of the one-way operation; additional clarity on land control and pedestrian visibility can be provided.	Submit revised visibility /access plan showing boundary works and splays.	Available visibility should be shown for both directions, however the banned direction does not need to be compliant; just show that errant vehicles can be seen. More importantly the pedestrian visibility should be demonstrated as these are the most vulnerable highway users. Again, proposals to ensure safe operation are basic information that is needed for any application and its omission results in an automatic objection.
Servicing	LGV-only servicing can be secured by condition and managed by a Servicing Management Plan.	Submit delivery protocol and accept condition restricting HGV deliveries.	Vehicle types are not within the control of the operator, therefore no such condition can be imposed or enforced. This is only appropriate for national companies that operate their own fleet and deliver everything. Furthermore, there is no basis to support the assumption. Basic groceries are often delivered on vehicles too large to use the service area. It must also be noted that, the service area has not been presented. No useful swept paths have been provided so there is no basis to accept any vehicles could service this store. At this stage it appears likely that servicing will be on street. The issue here is that the parking stresses would not facilitate this. The TRO preventing waiting would not prevent loading however this may not be successful.
Cycle parking and EV	The TS states staff and visitor cycle parking will be provided; EV provision can be shown on the revised layout.	Add visitor cycle parking and EV/passive EV provision to layout.	It is not sufficient to state that these facilities will be provided because the site is constrained and previous iterations have failed to demonstrate that a satisfactory car/cycle parking arrangement is possible. If a layout is provided showing sufficient parking and manoeuvring space the details can be conditioned. Sufficient space for appropriate cycle stores must also be demonstrated.
Policy balance	The proposal supports reuse of a Derelict/vacant commercial building, local regeneration, sustainable transport objectives and urban placemaking.	Emphasise PPW, TAN 18, Newport LDP SP1, SP18, GP2, GP4 and T4	Highways are aware of the relevant policies. The application must show how they have been adopted. How is this development sustainable in transport terms? Highways will consider safety paramount, and this is written into policy too.

Additional comments

The text makes a number of other statements that are not accepted. The submission therefore simply shows that the application was lacking sufficient detail to demonstrate that the proposed development could operate without detriment to the safe operation of adjacent highways.

Highways are under no illusion regarding the scale or nature of the store, but at this time no on-site parking or servicing (or safe access) has been demonstrated and the Parking survey is considered flawed.

We note that the TS stated a lot of things would be provided, but it is necessary to demonstrate that adequate facilities can be provided with such a constrained site. It is not reasonable to apply conditions unless it is clear that they can be discharged.

We note that the applicant acknowledges the uncertainty of introducing TROs. These were proposed to improve visibility/safety so their omission is significant. Furthermore, it appears at this stage, that the only satisfactory way of servicing would be on street (as proposed on previous iterations). Whilst Highways would not be supportive of increasing parking demand and simultaneously reducing availability, servicing and visibility issues must be considered fully.

Plans and further detail of trip generation and routing and the parking survey will be welcomed to try to address the issues.