

Highway Response

Ref: 25/0152

Date: 22/04/26

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 latest iteration appears to be 029-A dated Jan 26

The assessment 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:

- Previously we commented "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."
- The latest drawing/rev A says "DELIVERIES TO BE PROVIDED FROM THE MAIN INFRASTRUCTURE / FULL TURNING MANEUVER COMPLETED ON PRIVATE PARKING SPACE" (sic) for P12, 13, 18 and 19. This is not acceptable. The result is HGVs and other vehicles remaining on the highway and obstructing the accesses and adjacent crossing points and junctions and visibility of both. They will potentially remain for some time as the drivers will have to carry large goods a significant distance. This is a safety issue.
- We previously commented that "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". It appears no amendments have been made, and the issue has not been addressed.
- We previously commented "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." This issue has not been addressed.
- Similarly, with P19, we would reiterate that 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. This issue has not been addressed

- As previously stated, 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. This issue has not been addressed.

In conclusion the assessments show that even vehicles significantly below the maximum length will not be able to access many properties safely and lawfully. Instead, they will pose a potential obstruction and create highway safety issues.

In response to the specific points made in the previous rebuttal we would refer the applicant to previous comments.

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 pedestrian crossing points, bends and junctions. They would obstruct visibility for the main carriageway as well as the cul-de-sacs they're visiting, pedestrians crossing 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.

Pump Tracking 24519-C-021-F (amended plan)

- The tracking is not considered helpful as it is less onerous than other assessments.
- It is acceptable for fire pumps etc to obstruct traffic on the main road as they would most likely stop it anyway.
- 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-I (updated plan)

- The key points were set out in our previous comments. We would refer the applicant back to them. Specific changes are addressed below.
- Parking in courtyards 1 and 4 is more rational and less likely to impact highway, however experience shows that it would not be used and parking would occur on street.
- 136 manoeuvres (now 146?) are now shown and the issue addressed by removing the space previously available for larger vehicles to turn. This is just a different issue now.
- We note an improved layout in terms of parking and rear access in the area of 152 (now 120/3 and 168)
- 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.
- All car park accesses serving more than two properties should be designed as a cul de sac with radius kerbs, tactiles 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. This issue has not been addressed

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. Exceptions such as the bend adjacent to 131 will require the removal of PD for fences/boundary treatments. Provision of visibility within highway is always the first choice.
- Splays should be added for the access junctions and the turning head/private drive T junctions. Accesses adjacent to 152 and 153 is still not shown. (pedestrian visibility will be an issue here). Adjacent to 179 is only drawn to one side. (Not necessarily an issue but missing information).
- Between units 8 and 9 the visibility is also not achieved within highway. This is not acceptable and would require the removal of PD rights. (not an appropriate measure but theoretically allows visibility).
- Visibility is key to safety and must be provided within adopted highway.

LAP Proposals Drawings 1562A10-LLA-ZZ-00-DR-L-0401 P05

No further comments

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

- The amended plan does indicate where connections are intended, but does not show how they are provided.
- Some signs and tactile paving are now shown, but the tactiles are not relevant to cycles.
- Finer detail can be conditioned when it is shown that sufficient space is dedicated.

Street Lighting Layout – Planning 24519 – C - 025- G Updated plan

- 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.

Planning Layout LLAN/COL/001 rev E

- 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 missing (eg lanes 9, 13 and 18 appear to have paint on one side, which will be obstructed by parked cars and provides no protection from vehicles).
- Shared surfaces must have additional width to provide for pedestrians and take account of parking, servicing and disabled users. (All Wales standard).
- Private drives should not serve more than 5 units maximum, some serve 7 /10 (units 215/222 and 169/179). These should be reduced and will need management plans in perpetuity.
- 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 unacceptable build outs appear to have been removed.
- 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. (courtyards 1 to 4 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.
- Private drives need provision for visitor parking. 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 perceived safety/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. Where garages are relied upon, they must meet the standard for a double garage.
- Extensive dropped kerbs are used to provide parking, but we note this has been reduced.
- Parking is provided on the inside of bends where it is unlikely there will be sufficient visibility. Eg 113.

Manco 01 rev D

The Manco should maintain all areas until adoption is achieved. Some of the areas indicated for adoption are not to adoptable standards. Provision should therefore be made to ensure continued maintenance of these areas if the s38 fails.

BTP 001 Rev E

Boundary treatments include railings adjacent to footway crossings. These are not appropriate and do not give the level of pedestrian visibility required. They may prejudice licensing of the crossings used to access courtyards from Main Street. This should be chamfered as elsewhere.

The boundary for 38 prevents pedestrian visibility from the adjacent parking space.

Hedges adjacent to drives/footway also prevent pedestrian visibility being achieved and raise objections.

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 would maintain a number of objections relating to highway safety, sustainability and design standards. If the layout is not amended, the applicant should note that it will prejudice their ability to have the development roads adopted and footway crossings to courtyards from Main Street may not be licensed by Highways. Adoption and Licensing are separate from and independent of Planning.