



[REDACTED]

Mr Aled Gruffydd  
The Coroner's Office  
The Guild Hall  
Swansea SA1 4PE

[REDACTED]

10<sup>th</sup> March 2026

Dear Mr Gruffydd

**Regulation 28: Formal Response**  
**Inquest into the death of Lyn Morgan, A465 (2013 Incident)**

In response to your Regulation 28 Report to Prevent Future Deaths concerning the tragic death of Mr Lyn Morgan (2013 incident).

The Welsh Government extends its deepest condolences to the family of Mr Morgan and sincerely apologises for the failure to respond to the original letter in 2019. The Welsh Government is committed to improving road safety and take all incidents that occur on the trunk road very seriously. We acknowledge the concerns raised regarding the operation of the nearside and central reserve safety barriers during the incident.

**Technical Assessment and Containment Level**

Historic as-built records and information from our Operational Agent confirm that the nearside and central reserve barriers installed at the location at the time of the 2013 incident were systems of N2 containment level.

N2 containment was, and continues to be, the nationally recognised default containment level for this category of dual carriageway. This aligns with long standing UK practice and the national standards applicable at the time.

Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

## **Appropriateness of N2 Containment at this location**

Based on site characteristics, traffic volumes, and risk factors at the time of construction, there was no engineering justification to apply higher containment (e.g., H1/H2). National guidance requires such upgrades only where:

- there is a documented pattern of HGV breaches,
- unusually high HGV proportions, or
- specific hazards such as structures or significant embankments.

No such factors were present at this location. Retaining N2 containment was therefore appropriate and consistent with national policy.

Introducing a higher default containment level across Wales would:

- be disproportionately costly,
- require extensive network-wide reconstruction,
- not be supported by national evidence on risk frequency.

Changes of this scale are led at a UK national level by National Highways, who are currently carrying out research into future containment policy. Welsh Government continues to contribute network data and engage in these discussions.

Where national standards evolve, Welsh Government will adopt and apply them appropriately.

## **Appropriateness of N2 Containment Level and Testing Limitations**

Modern terminology allows us to compare such systems broadly to an N2 containment class, a level validated through dynamic testing on a Class B (1.5 tonne) vehicle with strictly controlled impact conditions, typically at 20°.

Only under these prescribed conditions can performance be assured.

However, as noted in the coroner's findings, the incident involved:

- a 19 tonne articulated HGV with a log-carrying trailer,
- travelling at an unknown impact angle, and
- interacting with the nearside barrier for 0.58 seconds, significantly below the standard driver reaction window.

HGV impacts lie outside the test envelope for N2-type systems, meaning performance cannot be reliably predicted or certified under such circumstances.

The coroner described how the lorry's wheel height and the lack of driver input meant the initial barrier contact generated unintended steering forces that contributed to vehicle redirection across the carriageway.

While modern barrier systems are designed to avoid redirection into live lanes, any interaction with vehicles far exceeding the tested mass and geometry can produce unpredictable outcomes.

## **Welsh Government Policy Position and Forward Actions**

As stated above, the Welsh Government is committed to improving road safety. In line with this commitment, it will ensure that the following policy positions and forward actions are taken forward:

- Apply national standards for barrier containment to ensure consistency across the UK Strategic Road Network (SRN).
- Continue working with National Highways on any review of modern-day default containment levels.
- Adopt any changes to national policy if, and when, they are formally introduced.

- Continue to monitor incidents of this type and review containment policy and practice should future data indicate emerging risks such as central reserve breaches involving HGVs.

We acknowledge the gravity of the concerns raised in the Regulation 28 report and appreciate the opportunity to provide clarification.

Safety barriers installed historically were compliant with the standards of the time and performed within the limits of their intended containment class.

However, no barrier can be guaranteed to perform predictably when struck by a vehicle far exceeding its tested mass and at an uncontrolled impact angle.

Welsh Government remains committed to:

- applying national standards,
- contributing data to national research, and
- taking proportionate, evidence-based actions to minimise future risk.

Please do not hesitate to make contact if you wish to discuss this matter further or require any additional information.

Yours sincerely



**Dirprwy Gyfarwyddwr / Deputy Director**  
**Is-adran y Rhwydwaith Ffyrdd Strategol / Strategic Road Network Division**  
Cysylltedd Trafnidiaeth a Digidol / Transport and Digital Connectivity  
Yr Economi, Ynni a Thrafnidiaeth / Economy, Energy & Transport  
Llywodraeth Cymru / Welsh Government