

Planning Statement

Outline application (with Access to be determined) for development of a new Motorway Rest Area (MRA).

Land at Junction 16 (M4), Swindon

On behalf of:

Moto Hospitality Limited

October 2023

Ref: 715

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Appendices

Appendix 1 – Department for Transport 01/2022 Circular: Appendix A Table 1

Appendix 2 – Copies of public consultation material

1 Introduction

1.1 This Planning Statement has been prepared by Smith Jenkins Ltd on behalf of Moto Hospitality Ltd ('the Applicant') in relation to the proposed development at Land at Junction 16, M4 Motorway, Swindon ('the Site').

1.2 An application for outline planning permission has been submitted to Wiltshire Council, the local planning authority (LPA), for the following proposed development:

"Outline application (with Access to be determined) for development of a new Motorway Rest Area (MRA) to provide up to 241 car parking spaces; up to 63 Heavy Goods Vehicle (HGV) parking spaces; coach and caravan parking; amenity building; fuel filling station; new access from B4005; and associated landscaping, infrastructure and ancillary works."

1.3 This Statement provides an assessment of the proposals against the Development Plan and in light of all other material considerations, including the National Planning Policy Framework ('NPPF'), in accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004.

1.4 This statement is set out as follows:

- **Section 2 – Background:** provides a detailed description of the Site and its surroundings and sets out other useful background information to the application including relevant planning history and pre application meetings.
- **Section 3 – Proposals:** provides a detail description and explanation of the proposed development.
- **Section 4 – Planning Policy:** sets out the planning policy framework against which the planning application should be assessed.
- **Section 5 – Planning Assessment:** provides a detailed justification for the development against relevant planning policies and taking account of all other material considerations.
- **Section 6 – Conclusion:** summarised the key benefit of the proposed development and the reasons why planning permission should be granted.

1.5 This Statement should be read in conjunction with the drawings and documents submitted with the planning application, which are referred to where relevant throughout this Statement.

2 Background

- 2.1 The Site is shown in the aerial photograph in Figure 1. It is an irregularly shaped parcel of land located on the urban fringe of Swindon and to the east of Junction 16 of the M4. The Site extends to 7.27 hectares. The B4005 (Hay Lane) runs along the western and southern boundaries of the Site and a drainage basin has recently been constructed directly to the west of the Site, as part of improvements to Junction 16. The M4 Motorway runs along the northern boundary of the Site in an east-west direction, with a small amount of vegetation separating the motorway and the Site. To the east of the Site are agricultural fields, beyond which lies a Travellers site. The Site is highly related to the urban area of Swindon. To the north of the M4 is the urban area of Swindon, this is connected to the Site by the B4005. There is also a large scale development to the north-east that is currently under construction.
- 2.2 An indicative site location plan is shown at **Figure 1** below:



Figure 1: Aerial Photograph of Site Location

- 2.3 The Site comprises of two agricultural fields, the fields are covered by grass ley, cropped for haylage. The two fields are separated by hedgerows. A small area in the south-west corner of the Site has been previously used as a depot for the recent improvements to Junction 16. However, the land has since been restored and surfacing removed from the Site.
- 2.4 The surrounding area, south of the M4, contains a mixture of land uses. Land uses mostly comprise of agricultural land or woodland. However, other uses are present, such as the aforementioned Travellers pitch site, North Wiltshire Crematorium, Solar Farms, Garden Centres, allotments and an Active Landfill Site. To the north of the M4, between the motorway and A3102, there is large-scale, mixed-use development.

Designations

- 2.5 The Site is not allocated for development in the Wiltshire Core Strategy (adopted 2015) and is located outside of any defined settlement limits. The Site has been allocated within a Mineral Safeguarding Area.
- 2.6 The Site is not situated in a conservation area, nor does it contain, or is it situated in the setting of, any listed buildings. The nearest conservation area to the Site is Royal Wootton Bassett Conservation Area, approximately 3.5 km away.
- 2.7 The Site is located within flood risk zone 1 and possesses a very low risk of flooding from rivers and seas (see Figure 2). Some areas of the Site are at risk from low-medium risk of surface water flooding (see Figure 3).

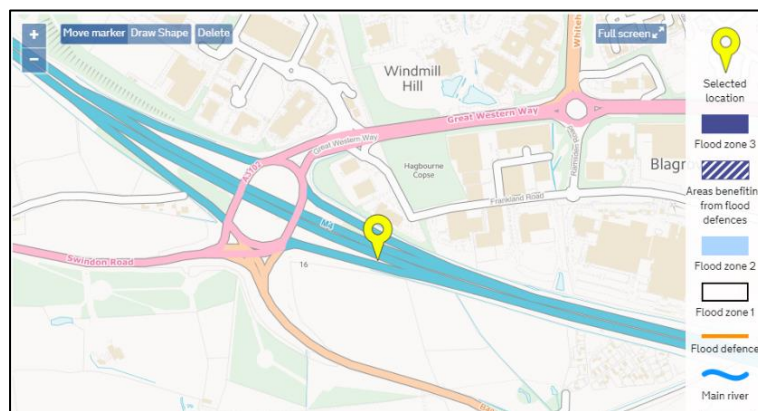


Figure 2: Environment Agency Flood Risk Map



Figure 3: Environment Agency Surface Water Flood Risk Map

- 2.8 The Site contains mature vegetation, largely trees and hedgerows. These are located on the edges of the existing agricultural fields. A Group Tree Preservation Order (TPO) is located within the Site. Figure 4 has been extracted from the Council's Interactive Mapping System and shows the extent of this TPO. However, none of the trees covered by the TPO are considered to still be on site, with the TPO now being largely historical.

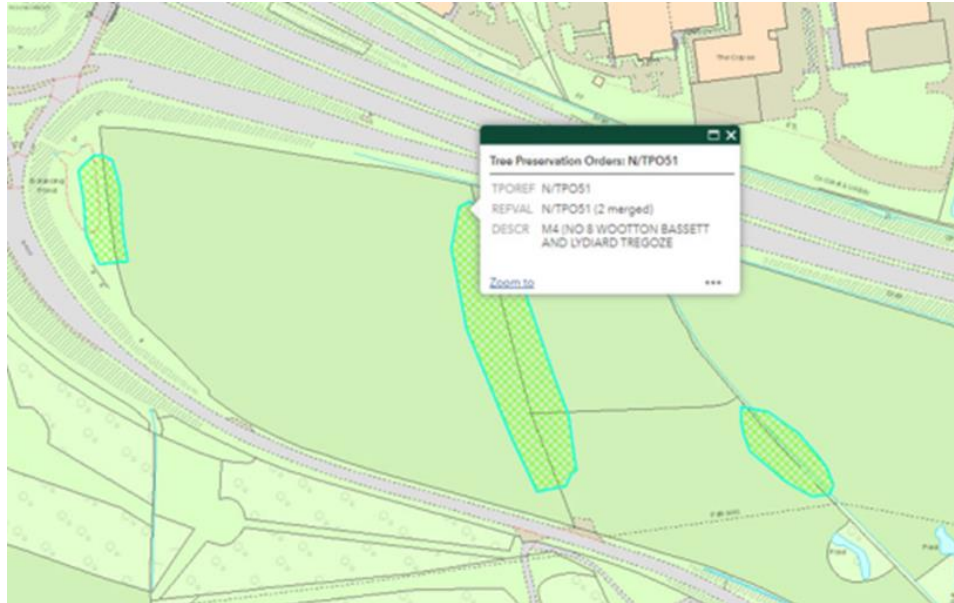


Figure 4: TPO ref: N/TPO51

Planning History

- 2.9 The LPA's online planning database shows records relating to Site, with the only planning history being to our Screening Request (ref. PL/2023/04823) in 2023 and an hedgerows notification in 2016 (ref. 16/07120/HRN) for the removal of three sections of hedge to facilitate the enlargement of M4 J16 embankment in 2016.
- 2.10 There is no further planning history publicly accessible relating to the Site.

Pre-Application Engagement with Wiltshire Council

- 2.11 As part of the application process, a pre-application meeting was held with representatives from Wiltshire Council to discuss the initial proposals for the development of a Truck stop and EV charging hub on the Site. The pre application meeting took place on the 16 December 2022 and related to the following proposed development:

"Creation of HGV Park facilities of 199 HGV parking spaces, 66 electric vehicle spaces, 1 HGV abnormal load space, 1 no. coach space, 1 no. caravan space, an amenity building, HGV fuel filling station, and a drive thru building with 20 additional car parking spaces."

- 2.12 It was demonstrated within this pre-application submission that the Site's location provided good connectivity to the Strategic Road Network (SRN) and is generally supported by the national planning policy. With that being said, the case officer did raise some concerns at how the application would relate to that of local planning policies CP1 (Settlement Strategy) and CP2 (Delivery Strategy).
- 2.13 Key areas identified from the LPA's response are listed below.
- Highway impacts on the B4005;
 - Facilities to be provided in line with DfT 02/2013;
 - Concerns due to location outside of an employment area;

- Loss of land contributing to the wider higher biodiversity value sites;
- Requirement for the building to score as excellent in terms of BRE AAM;
- Future proofing of the HGV parking areas; and
- Development outside of defined settlement boundaries.

2.14 Since this time, the scheme has evolved to now propose a Motorway Rest Area (MRA) ,with a greater number of parking spaces a smaller number of HGV spaces and seeks to address matters raised through the pre-application process.

2.15 An Environmental Impact Assessment (EIA) Screening Opinion request was submitted to Wiltshire Council (the LPA) on 15 June 2023 for the following description of development

“Outline Application with reserved matters for the development of a Motorway Rest Area (MRA) to provide 255 Car Parking Spaces, 62 Heavy Goods Vehicle (HGV) parking, additional vehicle parking, amenity Building, fuelling station and associated landscaping and works at Land at junction 16, M4 Motorway, Swindon.”

2.16 A Screening response was received on 15 August 2023 (ref: PL/2023/04823). This decision advised that an Environmental Impact Assessment is not required for the development. However, given project timescales, and to be robust, an Environmental Statement has been submitted as part of the application. The currently submitted application description of development is substantially in accordance with the description of development for EIA Screening.

3 Proposals

3.1 As will be explained in greater detail below, the application proposes a new 'Fit for the Future' Motorway Rest Area (MRA). An MRA is a smaller service area facility (compared to a full Motorway Service Area – MSA) and as per the Circular 01/2022 it must:

- Be available 24 hours a day throughout the year;
- Provide free parking for a minimum of 2 hours for all vehicles permitted to use the facility;
- Have free-to-use toilets with hand washing facilities, and at least 1 changing places toilet and 1 for people with disabilities, and no need to make a purchase during opening hours;
- Access to a free-of-charge telephone for emergency use, Wi-Fi and power points available for device charging;

3.2 The description of development is as follows:

"Outline application (with Access to be determined) for development of a new Motorway Rest Area (MRA) to provide up to 241 car parking spaces; up to 63 Heavy Goods Vehicle (HGV) parking spaces; coach and caravan parking; amenity building; fuel filling station; new roundabout access from B4005; and associated landscaping, infrastructure and ancillary works."

3.3 The application seeks outline planning permission with Access being the only matter to be determined. As mentioned above, access will be taken from the B4005. These works will involve the creation of a new 55.0m ICD access roundabout into the site. This roundabout will also provide for a continued farm access to the land to the east.

3.4 Scale, Layout, Appearance and Landscaping are all to be left for reserved matters stage. A Proposed Layout Plan (illustrative) (ref. M49_101 Rev G) and Illustrative Masterplan (ref. M49_115 Rev A) have been submitted in support of the application (but are not formal application plans) and show how the development can be laid out. The various report submitted with the application, and the Environmental Statement, have been based on these details. Additionally, a Parameters Plan (ref. M49_110 rev C) has been submitted as a formal application drawing that the Environmental Statement is based upon.

3.5 The submitted plans show that a large part of the site on the eastern side has been exclusively reserved for biodiversity net gain, having regard to the policy preference for biodiversity to be provided for on-site as opposed to off site. It has been determined that its further preferable from an ongoing management perspective for an area of land to be exclusively reserved for biodiversity as opposed to smaller parcels within the built development being reserved for BNG purposes. Nevertheless, the built development does incorporate large ecological areas including drainage, green roofs and boundary planting, in addition to the eastern most field that almost entirely given over to BNG.

3.6 The scheme will provide a significant quantity of HGV parking in an area where there is an identified need for such facilities. A full list of the proposed parking provision is detailed below:

- 241 no. Car Parking Spaces;
- 62 no. Heavy Goods Vehicle Parking Spaces;
- 1 no. Heavy Goods Vehicle Parking Space (Abnormal Load);
- 6 no. Coach Parking Spaces;

- 7 no. Caravan Spaces; and
- 12 no. Motorcycle Spaces.

- 3.7 Through completion of surveys by the Applicant's transport consultant, the number of parking spaces on-site has been calculated to be in accordance with the requirements of Table 2 (Appendix A) of the Department for Transport 01/2022 Circular.
- 3.8 This development will be one of the first Motorway Rest Areas where all car parking spaces will possess EV charging capabilities, with 50 'ready to use' charging points delivered on opening and the remaining spaces equipped with passive charging capabilities that can be brought into use in the future. This provision would contribute towards meeting the rise in EV ownership within the UK. The development of additional EV charging facilities also aligns with the Government's intention to ban the sale of new petrol and diesel cars and vans by 2035. All HGV spaces will possess the capability to deliver EV charging facilities in the future.
- 3.9 The provision of additional EV charging points in this location would also contribute towards meeting the need for such facilities in the wider south-west region. As is detailed later in this statement, the south-west has traditionally suffered from under provision of EV charging facilities and thus the proposed development would make a substantial contribution towards addressing this issue.

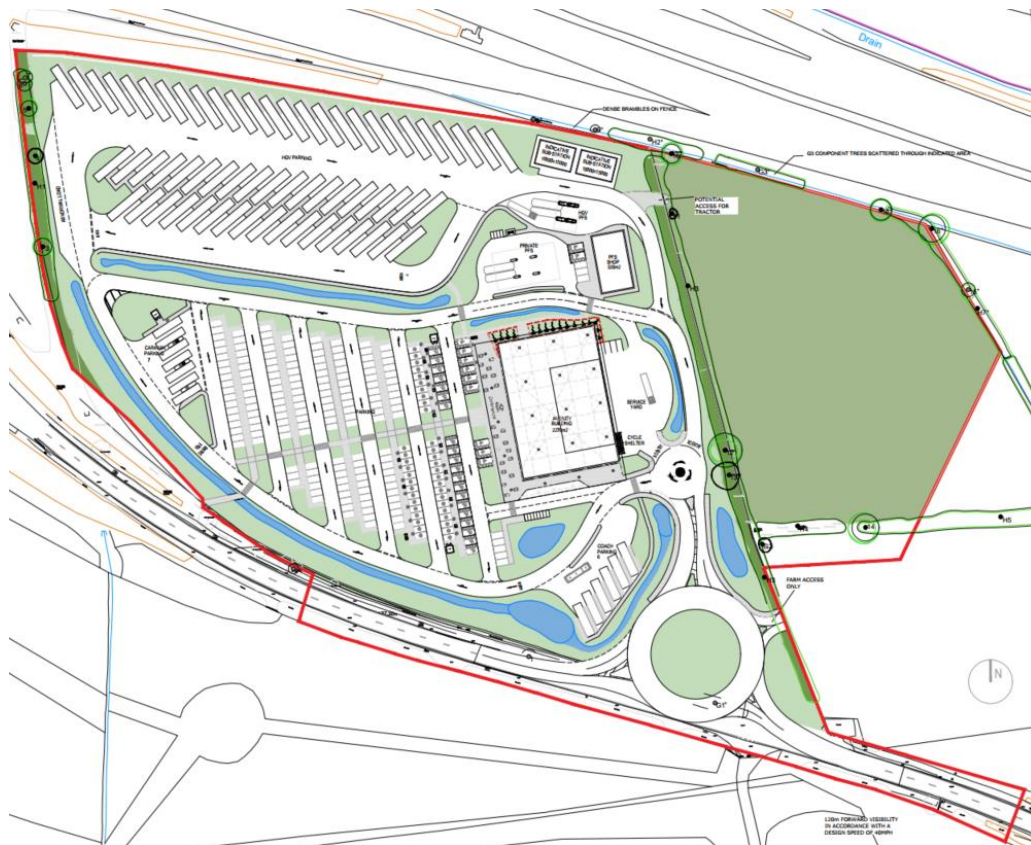


Figure 5: Proposed Site Layout (dwg no: M49_101 rev G)

- 3.10 The indicative landscaping scheme has been designed to ensure that it supports the ecological and drainage strategy of this application. The scheme will incorporate existing hedgerows and trees to

the site and enhance the Green Infrastructure through the provision of habitat spaces. The landscape scheme is to include:

- Woodland Planting
- Wildflower Meadows
- Wetland Meadow
- Native Scrub
- Ornamental Scrub
- Rain Garden

- 3.11 Through the preparation of a detailed landscaping scheme and extensive ecological survey work, the Site will achieve a biodiversity net gain on-site over 12.5% (14.2% habitat units and 10.3% hedgerow units). This is a significant benefit of the proposals and contributes towards the overall sustainability of the development.
- 3.12 The scheme is also to provide an external lighting scheme that is predominantly “warm white” lighting. This lighting scheme has been developed to ensure that the scheme mitigates its impact on the wider area to reduce the light spill. Much of the scheme has been fitted with dusk to dawn sensors that will automatically control when the lights are on improving the energy efficiency.
- 3.13 The lighting scheme has achieved a BREEAM rating of excellent. Further information on this is within the planning assessment (paragraphs 5.125 – 5.133).
- 3.14 Alongside the provision of parking arrangements, the proposals include a 2,270 sqm amenity building that will provide a range of high quality facilities to meet the welfare needs of users of the Strategic Road Network. The amenity building would be built to a BREEAM excellent standard which contributes further to the long-term sustainability and ‘fit for future’ status of the development.
- 3.15 The amenity building would provide the necessary services that are needed to comply with the Department for Transport 01/2022 Circular’s requirements for Motorway Rest Areas. A copy of these requirements is provided at **Appendix 1** of this planning statement.
- 3.16 In terms of its design, the proposed amenity building will consist of a barrel styled structure that reaches a maximum of 12 M high. A palette of high-quality materials has been chosen which both reflects the low carbon, sustainable aspirations of the development and respects the sensitive rural character of the Site’s surroundings. The building will boast a green roof to allow the building to blend provide a natural feel to the Site’s setting on the urban edge and maximise biodiversity net gain.
- 3.17 A fuel filling station will also be delivered as part of the proposals. This would be located to the north of the Site. The fuel filling station shop is to benefit from a green roof as well as 14 solar panels on the canopy roofing.
- 3.18 Figure 6 contains a CGI image below details the initial building designs and the surrounding landscape.



Figure 6: CGI Image of the proposed amenity building (Beech Design)

3.19 In summary, the development will:

- Deliver a 'Fit for the future' Motorway Rest Area including a purpose-built amenity building built to BREEAM Excellent standard.
- Provide EV charging facilities, including 50 active EV charging points upon occupation, to address unmet need in the south-west of England and contribute to Government targets regarding EV charging provision.
- Create 60+ HGV parking spaces and other associated facilities to contribute towards both the national and local identified need for such facilities in this area of the SRN.
- Achieve a + 12.5% gain in biodiversity through the provision of new and enhanced wildlife habitat.
- Support the safety and welfare of users of the SRN through the provision of additional service facilities.

4 Planning Policy

- 4.1 This section provides an overview of relevant national and local planning policy, which informs this application.
- 4.2 Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires planning applications to be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 4.3 The Development Plan comprises the Wiltshire Core Strategy (adopted 2015), saved policies from the North Wiltshire Local Plan (2011), and Wiltshire and Swindon Mineral Core Strategy (2009).
- 4.4 Wiltshire Council are currently undergoing a Local Plan review Consultation on an updated version of the local plan commenced in 2021 and the next round of consultations are to take place in Autumn 2023. At the time of writing, it is considered that minimal weight can be afforded to the updated version of the local plan, owing to the stage at which it is at in the plan making process.
- 4.5 The National Planning Policy Framework (NPPF); Planning Practice Guidance (PPG); supplementary guidance; and other Council policy documents can all be material considerations. In addition, the Department for Transport 01/2022 Circular provides a key framework for the provision of roadside service areas and freight facilities and is therefore a material consideration for the determination of this application. The Wiltshire Local Transport Plan (2011) is also a material consideration.

National Planning Policy Framework

- 4.6 The revised NPPF was published in September 2023 and sets out the Government's planning policies for England, and how they are expected to be applied. The NPPF is supported by the Planning Practice Guidance (PPG) which provides further advice relating to specific planning issues and processes.
- 4.7 Section 2 of the Framework recognises that there are three overarching objectives to achieving sustainable development, namely economic, social and environmental.
- 4.8 In regard to the three roles, the NPPF states:
 - a. an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*
 - b. a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and*
 - c. an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.*

4.9 At the heart of the NPPF is a presumption in favour of sustainable development. For decision taking this means that unless material considerations indicate otherwise:

- *approving development proposals that accord with an up-to-date development plan without delay; or*
- *where there are no relevant development plan policies, or the policies which are most important for determining the application area out-of-date, granting permission unless:*
 - i) The application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
 - ii) Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.*

4.10 In order to foster the delivery of sustainable development, Local Planning Authorities are encouraged to approach decision-taking on proposed development in a positive and creative way. Decision makers at entry level should seek to approve applications for sustainable development where possible through working proactively to secure developments which improve the economic, social and environmental conditions of an area (Paragraph 38).

4.11 Chapter 9 of the NPPF relates to promoting sustainable transportation. Paragraph 106 states:

Planning policies should:

- a) support an appropriate mix of uses across an area, and within larger scale sites, to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities;*
- b) be prepared with the active involvement of local highways authorities, other transport infrastructure providers and operators and neighbouring councils, so that strategies and investments for supporting sustainable transport and development patterns are aligned;*
- c) identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development;*
- d) provide for attractive and well-designed walking and cycling networks with supporting facilities such as secure cycle parking (drawing on Local Cycling and Walking Infrastructure Plans);*
- e) provide for any large scale transport facilities that need to be located in the area⁴⁴, and the infrastructure and wider development required to support their operation, expansion and contribution to the wider economy. In doing so they should take into account whether such development is likely to be a nationally significant infrastructure project and any relevant national policy statements; and*
- f) recognise the importance of maintaining a national network of general aviation airfields, and their need to adapt and change over time – taking into account their economic value in serving business, leisure, training and emergency service needs, and the Government's General Aviation Strategy⁴⁵.*

4.12 Footnote 44 states:

Policies for large scale facilities should, where necessary, be developed through collaboration between strategic policy-making authorities and other relevant bodies. Examples of such facilities include ports, airports, interchanges for rail freight, public transport projects and roadside services. The primary function of roadside services should be to support the safety and welfare of the road user (and most such proposals are unlikely to be nationally significant infrastructure projects).

4.13 Paragraph 109 which states:

Planning policies and decisions should recognise the importance of providing adequate overnight lorry parking facilities, taking into account any local shortages, to reduce the risk of parking in locations that lack proper facilities or could cause a nuisance. Proposals for new or expanded distribution centres should make provision for sufficient lorry parking to cater for their anticipated use.

4.14 Paragraph 111 states that: “Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.”

4.15 Chapter 12 of the NPPF relates to achieving well-designed places. Paragraph 130 states that planning policies and decisions should ensure that developments:

- a) *will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
- b) *are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*
- c) *are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*
- d) *establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;*
- e) *optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and*
- f) *create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.*

4.16 Chapter 14 relates to meeting the challenge of climate change, flooding and coastal change. Paragraph 159 states that:

Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.

4.17 Chapter 15 of the NPPF relates to conserving and enhancing the natural environment. Within this chapter Paragraph 174 states that planning policies and decisions should contribute to and enhance the natural and local environment by:

- *protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);*
- *recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland; and*
- *minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.*

4.18 Paragraph 180 of the NPPF states that development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists.

Development Plan Policy

Wiltshire Core Strategy (2015)

4.19 As stated above, the Development Plan is presently formed by the policies of the Wiltshire Core Strategy (2015). The relevant policies of the Development Plan are listed below:

4.20 Core Policy 1 ‘Settlement Strategy’ sets out areas where sustainable development will take place by identifying 4 key areas in settlement size. These are Principal Settlements, Market Towns, Local Service Centres and Large and Small Villages.

4.21 Core Policy 2 ‘Delivery Strategy’ was written in line with Core Policy 1 and aims to promote development in the most sustainable locations across the borough. This aims to target development within defined development limits and states development outside of these limits will not be permitted apart from the following exceptions:

- Additional employment land;
- Military establishments;
- Development related to tourism;
- Rural exception sites;
- Specialist accommodation provision; and
- Supporting rural life.

4.22 Core Policy 3 ‘Infrastructure Requirement’ states that all new development will be required to provide for the necessary on-site and, where appropriate, off-site infrastructure requirements arising from the proposal. All proposals will need to relate to the Wiltshire Council’s Infrastructure Delivery plan and schedule in ensuring that suitable infrastructure is provided.

4.23 Core Policy 41 ‘Sustainable construction and low-carbon energy’ aims to ensure that developments incorporate design measures to combat climate change through sustainable design methods. This policy states that all new non-residential developments will be required to meet BREEAM Excellent.

- 4.24 Core Policy 50 'Biodiversity and Geodiversity' represents the requirements for new development to ensure that mitigation strategies are implemented to restrict the development impacts. Additionally the council will expect developers to seek opportunities to enhance biodiversity through appropriate strategies.
- 4.25 Core Policy 51 'Landscape' confirms that development should protect, conserve and where possible enhance landscape character and must not have a harmful impact upon landscape character, while any negative impacts must be mitigated as far as possible through sensitive design and landscape measures. Proposals should be informed by and sympathetic to the distinctive character areas identified in the relevant Landscape Character Assessment(s) and any other relevant assessments and studies. In particular, proposals will need to demonstrate that the aspects of landscape character listed in the policy have been conserved and where possible enhanced through sensitive design, landscape mitigation and enhancement measures. These aspects include: the locally distinctive character of settlements and their landscape settings, and the separate identity of settlements and the transition between man-made and natural landscapes at the urban fringe.
- 4.26 Core Policy 52 'Green Infrastructure' states that development should retain and where possible enhance the existing green infrastructure on-site. Major developments are required to display how existing green infrastructure will be retained and enhanced through the development process.
- 4.27 Core Policy 55 'Air Quality' states proposals will need to demonstrate how measures can be taken to effectively mitigate the impacts of development and include details how this mitigation will be achieved.
- 4.28 Core Policy 57 'Ensuring High Quality Design and Place Shaping' outlines that a high standard of design is required in all new developments. Development is expected to create a strong sense of place through drawing on the local context and being complementary to the locality.
- 4.29 Core Policy 58 'Ensuring the conservation of the historic environment' states that development proposals should protect, conserve and enhance the historic surroundings where possible.
- 4.30 Core Policy 60 'Sustainable Transport' states the Council will aim to locate development within sustainable locations that encourage travel by sustainable transport modes and enable the efficient movement of people and goods within and through Wiltshire.
- 4.31 Core Policy 61 'Transport and New Development' states that new development should be located in areas that allow for access by sustainable transport alternatives, this should also be an important aspect of any proposals design.
- 4.32 Core Policy 62 'Development Impacts on the Transport network' relates to development impacts on the transport network and sets out that developments should provide appropriate mitigating measures to offset any adverse impacts on the transport network at both the construction and operational stages. Proposals for new development should not be accessed directly from the national primary route network outside built-up areas, unless an over-riding need can be demonstrated.
- 4.33 Core Policy 65 'Movement of Goods' confirms that the council and its partners will seek to achieve a sustainable freight distribution system which makes the most efficient use of road, rail and water networks. In particular, overnight lorry parking should be provided in the vicinity of the advisory freight network, either where demand can be demonstrated or to alleviate nuisance caused in local communities. Encouragement will be given for heavy goods vehicles (HGVs) traffic to use those roads

where a minimum of community and environmental impacts will occur, principally the advisory freight network. Where problems caused by HGVs making unnecessary and undesirable use of routes are identified (other than on advisory freight routes), freight management processes will be employed.

- 4.34 Core Policy 66 'Strategic Transport Network' relates to the strategic transport network, and sets out that work will be undertaken in conjunction with the Highways Agency, Network Rail, transport operators, neighbouring authorities and other agencies, that will seek to develop and improve the strategic transport network to support the objectives and policies in the Core Strategy and Local Transport Plan.
- 4.35 Core Policy 67 'Flood Risk' states that all new developments will be required to reduce rate of rainwater run-off and incorporate sustainable urban drainage as part of the development, unless conditions make this unviable.
- 4.36 Core Policy 68 'Water Resources' states that non-residential development will be required to incorporate water efficiency measures into the proposals design, details of the developments water efficiency will be required at submission of an application.

North Wiltshire Local Plan 2011 Saved Policies

- 4.37 Part of the Wiltshire local development scheme has incorporated saved policies from district local plans. In particular, the North Wiltshire Local Plan (2011) saved policies are of relevance for this application.
- 4.38 Saved Policy NE14 'Trees, Site Features and the Control of New Development' states that development will be resisted where it results in the loss of trees and hedges that could successfully be incorporated into the designs of the development.
- 4.39 Saved Policy NE18 'Noise and Pollution' sets out that development is not to generate or cause pollution to the environment by the emission of excessive noise, light intrusion, smoke, fumes, other forms of air pollution, heat, radiation, effluent or vibration.

Wiltshire and Swindon Mineral Core Strategy and Development Control Policies (2009)

- 4.40 Additional documents from the Wiltshire Development Plan that have been considered as part of this application are the Mineral Core Strategy which was adopted in 2009.
- 4.41 Policy MCS 6 'Safeguarding Mineral Resources, Rail-head Facilities and Mineral Recycling Facilities' states that after establishing, monitoring and reviewing Mineral Safeguarding Areas that the Council will work with stakeholders to safeguard these assets from sterilisation from forms of development.
- 4.42 Policy MDC 4 'Safeguarding Mineral Resources, Rail-head Facilities and Mineral Recycling Facilities' states that proposal for development within Mineral Safeguarding Areas will be resisted where they impact on future mineral extraction and ancillary operations, unless:
 - An appropriate quantity of mineral can be reasonably extracted prior to or in phase with the proposed non-mineral development such that the extraction does not unreasonably prevent or hinder the non-minerals development; or

- It can be proven that the mineral deposit is unlikely to be worked due to its quality or quantity; or
- The development is of a temporary nature and can be completed and the site restored to a condition that does not inhibit extraction within the timescale that the mineral is likely to be needed; or
- There is an overriding need for the proposed non-minerals development to commence without delay.

Material Considerations

Circular 01/2022: 'Strategic road network and the delivery of sustainable development'

- 4.43 During the summer of 2022, the Government undertook a consultation on amendments to 'Circular 02/2013: Strategic road network and the delivery of sustainable development'. The consultation period closed in September 2022. On 23 December 2022, Circular 02/2013 was formally superseded following the issue of DfT Circular 01/2022.
- 4.44 The adoption of the 01/2022 Circular formalised new, updates policy concerning the provision of roadside facilities. Prior to the Circular being updated, guidance regarding the provision of facilities was largely limited to motorway service areas ('MSAs'). The guidance stated that the maximum distance between MSAs should be situated at a maximum of 30 minutes travelling time, or no more than 28-miles. No guidance was previously available regarding the spacing between facilities specifically for goods vehicles.
- 4.45 The updated version of the Circular provides guidance regarding the spacing between freight facilities (Paragraph 81). The 01/2022 Circular states that where there is an identified need for parking facilities for HGVs, the National Highways will work with relevant local planning authorities to ensure that planning application decisions address the shortage of HGV parking on or near to the Strategic Road Network (SRN). To assist with this objective, the 01/2022 Circular states that local authorities should have regard to the following spacing requirements:
- (i) the maximum distance between motorway facilities providing HGV parking (being service areas, rest areas or truckstops) should be no more than 14 miles; and
 - (ii) the maximum distance between APTR (all purpose trunk road) facilities providing HGV parking (being at service areas or truckstops) should be the equivalent of 20 minutes driving time for HGVs.
- 4.46 The reason for the provision of this additional policy guidance is set out in Section 81 of the 01/2022 Circular, which highlights that there are certain parts of the SRN where, at certain times, there is a shortage of parking facilities for HGVs.
- 4.47 Circular 01/2022 does not require for traffic flows or routing to form part of a weighting process to evaluate the importance of a gap in the provision of freight facilities: the presence of a gap is sufficient to demonstrate that there is a requirement for a facility where there is an identified need. In all instances, access/egress arrangements of facilities are required to comply with the requirements of the Design Manual for Roads and Bridges ('DMRB')

Wiltshire Local Transport Plan (2011)

- 4.48 Policy T9 'Freight Strategy' states that encouragement will be given to direct HGVs into travelling on National Primary Route Network or Advisory Lorry Routes. The Wiltshire Local Transport Plans commits that the Council will support new development for commercial lorry parks in the vicinity of the strategic highway network.

5 Planning Assessment

Principle of Development

- 5.1 The application proposes development located on the urban fringe of Swindon outside of the settlement boundary. Moreover, the scheme does not fall within the category of development that the development plan, and specifically Core Policies 1 and 2 of the Wiltshire Core Strategy, states is permissible in such a location. The application conflicts with the development plan for this reason.
- 5.2 Notwithstanding this conflict, it is the duty of the LPA to consider whether the application presents any material considerations which may warrant a departure from the development plan and thus justify the grant of planning permission.
- 5.3 The material considerations deemed applicable to proposed development are:
- i) Need for HGV Spaces (Locally and Nationally);
 - ii) Need for EV Charging Spaces (Locally and Nationally);
 - iii) Biodiversity Enhancements;
 - iv) Significant Job Creation and Investment; and
 - v) Exceptional Design Qualities and Construction Methods.
- 5.4 The following text will outline each of the material considerations that provide support to the planning application, in light of its departure from the Development Plan.

Need for HGV Spaces

- 5.5 Movement of supplies within the UK depends on the high functionality of the SRN and its facilities. Road freight alone accounts for over three times the amount of movement of goods than rail and water combined. These movement include the transportation of food, medicine, fuel and other essential products (Road Investment Strategy 2: 2020-2025). Due to the stress on road freight, overnight lorry parking has become a significant issue. Truckstops are also typically built to a low/poor standard.
- 5.6 The National Lorry Parking Survey – Part 1 (NLPSP1) (2022) has confirmed the need for additional HGV parking spaces across the UK. The study found that there was an excess of 4,473 vehicles against on-site capacity at facilities in England.
- 5.7 The need for additional HGV spaces, coupled with the fact that the UK currently has a shortage of more than 100,000 HGV drivers (Road Haulage Association, 'A Report on the Driver Shortage' (2021)), makes the provision of new facilities across the SRN a priority for all local planning authorities.
- 5.8 The need for HGV spaces is reaffirmed by Paragraph 109 of the NPPF, which states:

Planning policies and decisions should recognise the importance of providing adequate overnight lorry parking facilities, taking into account any local shortages, to reduce the risk of parking in locations

that lack proper facilities or could cause a nuisance. Proposals for new or expanded distribution centres should make provision for sufficient lorry parking to cater for their anticipated use.

- 5.9 Paragraph 92 c) of the NPPF states that planning policies and decision should aim to achieve places which enable and support healthy lifestyles, especially where this would address identified local health and well-being needs. The shortage of spaces and lack of appropriate facilities across the country has led to an increase in HGV's parking overnight in laybys. Overnight parking in laybys leads to increased risk of theft and also endangers the safety and well-being of lorry drivers.
- 5.10 The Circular 01/2022 states that designated HGV parking spaces should be provided in situations where there is an identified need for freight facilities. Paragraph 81 of the Circular advises that when a need is identified, it is necessary for the local planning authority in question to ensure this need is met, in part, through decisions on planning applications. In terms of identifying need, footnote 26 of the 01/2022 Circular states:
- This [identified need] will be informed by regular updates to the Department for Transport's National Lorry Parking Survey and demand assessments undertaken by the company to ensure that appropriate evidence is available on the national picture.*
- 5.11 When an area of required need is identified, the Circular states that the maximum distance between HGV parking facilities on the SRN should be no more than 14 miles.
- 5.12 The NLPSP1 assessed HGV parking facilities across the country for their suitability and capacity. To appropriately address areas of the highest need, the existing level of capacity for HGV parking at sites were categorised into sectors based on recorded levels: Critical (greater or equal to 85%), Serious (70% to 84%) and Acceptable (less than 69% capacity).
- 5.13 The NLPSP1 identifies utilisation rates at Leigh Delamere (east and west), Chippenham Pit Stop, and Swindon Truck Stop. The Applicant's transport consultant, Eddisons, has collated data from primary surveys undertaken around Chieveley Services, Membury Services (east and west) and Sutton Scotney Services (east and west).
- 5.14 Capacity statistics for the surrounding HGV parking facilities are outlined in Table 1 below. These figures indicate that there is a critical need for HGV parking spaces in the locality.

Table 1: HGV Parking Facilities Capacity		
HGV Parking Area	Capacity	Source
Leigh Delamere (eastbound)	90% (Critical)	NLPSP1
Leigh Delamere (westbound)	58% (Acceptable)	NLPSP1
Chippenham Pit Stop	96% (Critical)	NLPSP1
Swindon Truck Stop	100% (Critical)	NLPSP1

Chieveley Services	83% (Serious)	Eddisons
Membury Services (eastbound)	74% (Serious)	Eddisons
Membury Services (westbound)	98% (Critical)	Eddisons
Sutton Scotney (northbound)	103% (Critical)	Eddisons
Sutton Scotney (southbound)	100% (Critical)	Eddisons

5.15 The above is also illustrated in the below diagram in Figure 7, as taken from the public consultation material prepared for the scheme (see **Appendix 2**).

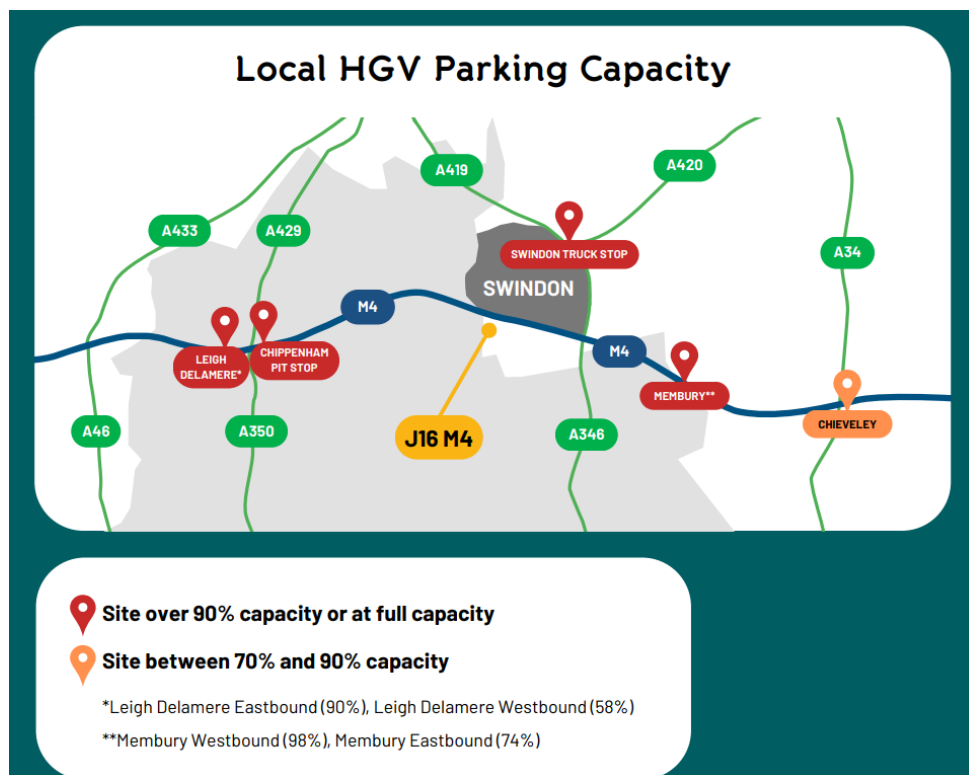


Figure 7: Extract from Public Consultation Material

- 5.16 To further understand the need in the area, surrounding laybys have also been assessed by the Applicant as part of this application. Laybys become a last resort for lorry drivers when appropriate facilities cannot be accessed. The high uptake of parking in laybys in the surrounding area adds further weight to the need for parking at the Site.
- 5.17 Primary data from Eddisons has been collated to support the application and is summarised in Section 2.7 and Appendix 1 of the accompanying Transport Assessment. This data captures the utilisation of laybys surrounding the Site by lorry drivers. These surveys were carried out from 7pm to 12am (midnight). This timeframe was selected to highlight the need for increased overnight parking availability in the area, in line with the NPPF.

- 5.18 20 no. laybys were surveyed in 15km radius from the centre of the Site. The data collated showed that anywhere between 72 to 92 HGV's were parked in the immediate area. This therefore establishes an immediate need of up to 92 HGV parking spaces in addition to the existing facilities. A local need is therefore present and further weight contributed to paragraph 109 of the NPPF.
- 5.19 As these facilities are not intended to be places of refuge for HGV drivers for an extended period of time, they lack appropriate facilities and amenities for drivers to properly rest. In what is already a demanding and tiring trade, the lack of ability to properly rest can lead to endangerment to the drivers and subsequently to the safety of other road users.
- 5.20 The constrained capacity of existing sites and inappropriate use of surrounding laybys justifies the provision of a new dedicated HGV parking facility, with high quality amenities/facilities for driver welfare in this location.
- 5.21 As mentioned previously, when a specific need for HGV parking has been identified, Paragraph 81 of the Circular 01/2022 can be engaged and the maximum distance between motorway service areas should be 14 miles. Critical capacity of the dedicated HGV parking areas establishes this need, in addition to the excess of up to 92 HGVs that have been recorded at laybys within 15km of the Site.
- 5.22 On this stretch of the M4, Leigh Delamere Services and Membury Services are the immediate motorway services in each direction from the Site. The distance between the HGV parking areas at these services is summarised below:
- Leigh Delamere (East) to Membury Services (East): 28.2 miles
 - Membury Services (West) to Leigh Delamere (West): 28.3 miles
 - Leigh Delamere (West) to Proposed Site Entrance: 14.6 miles
 - Proposed Site Entrance to Leigh Delamere (East): 14.5 miles
 - Membury Services (West) to Proposed Site Entrance: 14.3 miles
 - Proposed Site Entrance to Membury Services (East): 14.6 miles
- 5.23 Therefore, by virtue of both the absence of available HGV parking in the locality and the distance between the freight facilities at Leigh Delamere Services and Membury Services, the proposed development represents an optimal location to combat the shortfall in lorry parking provision on this section of the SRN. For these reasons, the significant quantity of HGV parking that the development would deliver should be afforded substantial weight in the planning balance, when considered against the aforementioned conflict with the development plan.

Need for EV Charging Spaces

- 5.24 The need for additional EV charging spaces is evident. The Road Investment Strategy 2: 2020-2025 opens its strategic vision with the following.

In a changing world, where the demands on our SRN and the opportunities provided by new technology to meet those demands are developing rapidly, our strategic vision seeks to ensure that the SRN is 'future ready', whatever may emerge.

- 5.25 The Rapid Charging Fund was announced in the March 2020 Budget as part of the government's commitment to roll out EV charging infrastructure. By 2035, government expects around 6,000 high-powered, open-access charge points (150-350 kW capable) to be installed across the SRN.

- 5.26 The purpose of this programme is to ensure that there is a high-powered and open-access charging network ready to meet consumer demand for EVs ahead of need, and to enable 80% of new cars and 70% of new vans sold in Great Britain set to be zero emission by 2030, increasing to 100% by 2035 and HGVs by 2040. The Government's intention is that this commitment will allow for UK to lead the way in design and manufacturing of EVs.
- 5.27 To meet the Government's target of phasing 100% of the sale of diesel cars and vans by 2035, extensive improvements will be required to the SRN. These facilities must be affordable, accessible and effective in operation. By the nature of their purpose, roadside facilities will play a critical role in achieving this can be implemented.
- 5.28 In line with these commitments, Moto have committed extensive analysis into current and existing trends to understand how many EV chargers will be needed at Moto destinations. Moto have collected primary data to create predicted figures on the quantity of EV charging points needed across all their sites. The predicted need for EV charge points are:
- 2023: 773 chargers;
 - 2025: 1,045 chargers;
 - 2030: 2,217 chargers; and
 - 2040: 4,707 chargers.
- 5.29 The planning application proposes 50 no. car parking spaces with active EV charging points upon opening. All car parking spaces would possess passive charging capabilities that can be brought into use in the future and will be enlarged spaces to help facilitate this.
- 5.30 In addition, all HGV spaces have been designed with the capacity to accommodate EV charging as charging technology advances.
- 5.31 Importantly, the application would be delivering a significant quantity of EV charging points in a region that has been identified as being deficient in such facilities. In the Government's 'Electric vehicle charging device statistics (July 2023)', the south west ranked 6th lowest of out 12 regions across the UK, for EV charging points per 100,000 population. The additional 50 no. immediately active EV spaces and 191 no. passive charging points will significantly help the boost this figure. This study also found that only 7% of chargers are located at 'en route' locations (en route locations include motorway services areas or service stations).
- 5.32 There is a lack of opportunities for EV vehicle users to access charging stations in the surrounding facilities immediately surrounding the Site and on the SRN. As per ZapMap data (2023), Leigh Delamere (West) has 9 charging stations, Leigh Delamere (East) has 3 charging stations, Membury Services (West) has 2 charging stations and Membury Services (East) has 2 charging stations. The 50 chargers that would be delivered upon opening would increase availability by 312.5% on this stretch of the SRN.
- 5.33 EV charging and the number of EV on the road have a symbiotic relationship. It has long been established that potential EV users are often discouraged from purchase EVs due to 'range anxiety'. The Road Investment Strategy 2015-2020 aims to ensure that an EV charging point is available every 20 miles on the SRN. As is identified above, Leigh Delamere (East) to Membury Services (East) is 28.2 miles and Membury Services (West) to Leigh Delamere (West) is 28.3 miles. Therefore, the existing facilities on the SRN do not meet this target. Once constructed, EV charging points will be made

available within the 20 miles target, thus limiting the potential for range anxiety amongst potential and current EV users.

- 5.34 A 2020 appeal decision (PINS ref: APP/F1610/W/20/3248674) shows the south-west have traditionally fallen short in the delivery of EV charging facilities. In paragraph 16, the Inspector states:

the provision of public charging points in the southwest is currently at a very low level,³ with the average distance between public charging points in the Cotswolds being between 20 and 35 miles. To date, the Council has installed only 2 EV charging points in its public car parks, one in Moreton-in-Marsh and one in Cirencester. There is good evidence that the deficiency in provision compared with other regions, combined with the relatively longer journeys that those living in rural areas tend to make, is a contributory factor in the comparatively low levels of EV ownership in the south west

- 5.35 While this appeal is now over two years old, it is still relevant due to any commitment to EV provision in this area being severely limited. Latest data from April to June 2023 shows that the total number of EV spaces in the south west is currently growing at 7.2%. This puts the growth of EV charging devices in this region as the third lowest in England.
- 5.36 In addition to this, the Appeal Site was located within the Cotswold Area of Outstanding Natural Beauty ('AONB'). AONBs enjoy levels of protection from development similar to those of UK national parks, and thus their preservation and conservation carries significant weight in planning terms. The Site itself is located in the 'open countryside' but holds no higher designation (i.e. Green Belt or AONB). The Inspector's decision to allow the provision of dedicated EV charging areas within an AONB area demonstrates both the need for additional EV charging in the south-west and the weight that should be afforded to schemes which seek to address this need.
- 5.37 In summary, the scheme will deliver a significant quantity of EV charging facilities. These facilities will continue to grow and expand throughout the lifetime of the development. As a consequence, the proposed development will make a critical contribution towards EV charging at both a national and local level and broader Government targets regarding the elimination of non-EV vehicles by 2040. In the planning balance, substantial weight should be afforded to these clear and demonstrable benefits.

Biodiversity Enhancements

- 5.38 The proposed development will deliver a biodiversity net gain (BNG) of circa 12.5% (14.2% in habitat units and 10.3% in hedgerow units). BNG is a material consideration for all developments. The Environment Act is set to be adopted in November 2023. The Act will require all major developments to deliver a 10% BNG. Core Policy 50 of the Wiltshire Core Strategy only requires developments to deliver no net loss. Paragraph 180 (d) of the NPPF states:

development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.

- 5.39 The proposed development will exceed the requirements of both current local planning policy and, at the time of writing, future requirements of the Environment Act. Furthermore, the commitment

to delivering a significant net gain in biodiversity aligns with Moto's commitment to create a sustainable, 'Fit for future' development and the aforementioned provisions of the NPPF.

- 5.40 Further to this, a recent appeal decision for 181 new homes in the Green Belt (PINS ref: APP/P0240/W/21/3289401) concluded that if a scheme exceeds the quantity of BNG required by national and local policy, 'moderate positive weight' could be attributed in favour of the development in the planning balance. Whilst the appeal decision in question concerned a scheme for 181 dwellings to be built out over existing agricultural land, it is directly applicable to the Applicant's proposals by virtue of the significant gain in biodiversity that the application would deliver.
- 5.41 As stated above, the proposed development will deliver a 14.2% net gain in habitat units at the Site. Moderate positive weight can therefore be attributed to the proposed development, given its commitment to exceeding both local and future national policy requirements.

Job Creation and Community Investment

- 5.42 Moto are the UK's largest provider of motorway services. As a result of this, Moto employ thousands of people across the UK. Approval of this application will see the surrounding area reap significant socio-economic benefits via additional job creation during both the construction and operational phases of the development. Moto are committed to provide local trades job opportunities when possible. It is estimated that an investment of upwards of £30m into the local economy will be facilitated by this development.
- 5.43 In addition to jobs created through construction, Moto employs 5,000 people across its 59 locations across the UK. Upon opening, a minimum of 150 new jobs will become available to local residents.
- 5.44 The Moto Foundation is also prevalent at all Moto destinations across the UK. The Moto Foundation was first created in 2005 and provides direct support to identified locations of need to the areas surrounding its Sites. Since created in 2005, the foundation has raised over £9m, other achievements include:
- £1m raised in 2022, with the same target set for the coming 5 years;
 - Moto Foundation recognises the importance to mental health to residents and employees and therefore have partnered with SAMH (Scottish Association for Mental Health) and Mind;
 - £700,000 has been donated to the Woodland Trust & Wildfowl & Wetland Trust (with over 30,000 native trees planted);
 - 700 local community grants have been issued to local, independent charities within 25 miles of existing Moto sites; and
 - Local schools to existing Moto sites have benefitted from over 180,000 books and support to breakfast clubs from brand partner, Greggs.
- 5.45 This Statement considers the socio-economic benefits that the scheme would deliver weigh in favour of the development in the planning balance.

Design Quality and Sustainable Construction Initiatives

- 5.46 The proposed development has been designed with highest quality possible in all aspects of development. From conception of the proposed development the Applicant has followed a

‘sustainability first’ approach. Through careful consideration of scheme design, the Applicant can commit to achieving a BREEAM Excellent rating on the proposed amenity building.

5.47 Paragraph 134 of the NPPF states:

Development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes. Conversely, significant weight should be given to:

a) development which reflects local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes; and/or

b) outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.

5.48 The proposed development embodies the aims and objectives of both national and local planning policy in regard to achieving sustainable, high-quality development – as is exemplified by the Applicant’s commitment to delivering a BREEAM Excellent amenity building as part of this scheme. Positive weight should be afforded to the proposed development for this reason, when considered against the conflict with the development plan.

Summary

5.49 This Statement recognises that the proposed development represents a departure from the Development Plan by virtue of conflict with Core Policies 1 and 2 of the Wiltshire Core Strategy. However, it is the duty of the LPA to consider whether the application presents any material considerations which may warrant a departure from the development plan and thus justify the grant of planning permission.

5.50 Multiple material considerations have been identified for the development. The need for HGV and EV spaces in the locality, the significant net gain in biodiversity, the expansive investment/job creation and the exceptional design merits of scheme all weigh in favour of the development. When combined, the substantial benefits accrued by these material considerations demonstrably outweigh the harm associated with a departure from the development plan in this instance.

5.51 The remainder of this statement will address other planning considerations and technical matters relevant to the application proposals.

Other Planning Considerations and Technical Matters

Design and Layout

5.52 Core Policy 57 ‘Ensuring High Quality Design and Place Shaping’ requires all new development to include a high standard of design and make a positive contribution to the character of the area through:

- Enhancing local natural and historic distinctiveness;
- Retaining and enhancement of existing landscaping and natural features;
- Be respectful in terms of building layout, form, height, mass, scale, building line, plot size, elevational design, materials, streetscape and rooflines;
- Sympathetic to conserving historic buildings and landscapes;
- Maximisation of sustainable construction techniques and renewable energy resources;
- Respect any potential impacts on amenity on surrounding sites;
- Reduce measures of crime or antisocial behaviour;
- Create legible, safe and accessible places;
- Sensitive design of advertisement and signage;
- Plan for diversity and adaptability of sites;
- Use of high quality materials;
- Major application will need to be accompanied by a design and access statement and masterplan; and
- Meet the requirements of Core Policy 61.

5.53 The proposed development has been sensitively designed to respect the intrinsic value of the Site's surroundings. The proposed development recognises its designation within an 'open countryside' setting, albeit highly relatable to urban development. As such 'green' and sustainable methods of design have been a key value in developing the Site. For example, the amenity building's proposed green roof and barrelled design will limit its visual impact on the surrounding area. Green roofs are also proposed on the petrol filling station shop and substation buildings. PV Panels have been proposed on the roof of both the car/LGV and HGV/coach fuel filling stations. A Design and Access Statement (DAS) has been prepared by Beech Design and Build in support of the application. This includes details of the design principles of the scheme and how they were developed.

5.54 While this application is made in outline with the matter of appearance reserved for consideration at a later stage, the detail provided clearly demonstrates the Applicant's appreciation of the rural context of the Site and the high-quality nature of the proposed development. The DAS includes visuals which have been prepared for the purpose to provide context to the Planning Officer when undertaking their assessment.

Sustainability and BREEAM

5.55 Core Policy 41 states all new non-residential development will be required to meet BREEAM Excellent standards.

5.56 Core Policy 42 states that support will be afforded to standalone renewable energy schemes, subject to any other material constraints.

5.57 As mentioned previously, Core Policy 57 seeks to ensure that all new developments are built with the highest standard of design and relate positively to the surrounding area.

5.58 As mentioned above, the Applicant is committed to delivering a sustainable, high-quality, eco-conscious development.

5.59 To fulfil this commitment, the Applicant has procured a Sustainable Construction and Energy Statement, prepared by Service Design Associates (SDA). In addition, the scheme has been developed in collaboration with accredited BREEAM Assessor Encon Associates.

- 5.60 As previously mentioned, the goal of the development was to meet BREEAM excellent and achieve in excess of 10% BNG. While the application is made in outline, consideration has been given to several sustainability considerations which sit at the heart of the proposals. These include:
- Passive Design
 - Efficient Building Services Systems
 - Renewable Energy Generation
 - Water Efficiency
 - Sustainable Construction Materials
 - Biodiversity
- 5.61 Moreover, the scheme will incorporate permeable paving, green roofs, high use of timber in construction and incorporating various material saving strategies to minimise waste in construction and operational phases. Details on the implementation of these strategies are found in the Sustainability and Energy Statement.
- 5.62 Ultimately, the Sustainability and Energy Statement concludes that the proposed development would satisfy local and national policy requirements in regard to sustainability and achieving a BREEAM Excellent rating. Once complete the development would lead to significant benefits to the economic, social and environmental state of the surrounds.

Landscape

- 5.63 Core Policy 51 states confirms that development should protect, conserve and where possible enhance landscape character and must not have a harmful impact upon landscape character.
- 5.64 Core Policy 52 seeks to promote the retention of existing trees and green infrastructure on Site and ensure that major developments are able to deliver necessary green strategies.
- 5.65 The Site has an Agricultural Land Classification of Subgrade 3b “moderate” quality and therefore does not qualify as being Best and Most Versatile (BMV) land. There is no conflict with local or national policy that will constrain the loss of non BMV land.
- 5.66 As detailed within the chapter 8 of the Environmental Statement, the site makes up a small proportion of the Calne Rolling Clay Lowland which is land classified as *“of urban Swindon, the M4 corridor, open spaces, various farmsteads, a mix of arable and pasture fields, contained woodlands and part of the North Wessex Downs AONB”*.
- 5.67 As part of this application a Landscape and Visual Assessment (LVIA) forms Chapter 8 of the ES and has been produced to ensure that the proposed landscape strategy will be able to successfully mitigate any impacts the development has on the wider landscape and existing views. The LVIA has been completed by IDP and has assessed the visual impacts from a range of locations as agreed with the Landscape officer for Wiltshire Council.
- 5.68 The LVIA has undertaken assessments on the landscaping impacts expected in both the construction and operation phase for the development.
- 5.69 During the construction phase, the required works will be working in line with a Construction and Environmental Management Plan (CEMP) that will ensure the development is constructed in line with the local authority regulations. Key mitigation strategies for the construction phase are to be:

- *Minimise construction area and contractor's temporary work area to avoid unnecessary impacts to landscape resources and to minimise visual intrusion*
- *Site hoarding should be designed sensitively in both colour and size, to screen views to the construction work but not form a prominent feature*
- *Follow operational time restrictions to limit after dark works and lighting – the security lighting would be kept to a minimum level needed for visual and security protection*
- *Existing trees, shrubs, scrub and structural planting would be retained as part of the Proposed Development and appropriate fencing to British Standards erected to protect Root Protection Areas and canopies of planting or trees.*

5.70 As such, the report concluded that the construction phase will result in a temporary effect on the landscape, although the overall impacts are considered minimal. The majority of the land lost will be internal ley grassland and the periphery of the site is to be protected.

5.71 The operational phase of the development will seek to mitigate any impacts to the site landscape and visual qualities by providing a planting strategy that matures and integrates existing green infrastructure. Section 5.2 of the Design and Access Statement details the landscaping strategy, this shows the extent of the proposed works, including approximately 14,000 sqm of planting is proposed on Site. This will be delivered through the retention of existing trees and hedgerows and the provision of a range of additional soft landscaping features including;

- *Woodland Planting*
- *Wildflower Meadows*
- *Wetland Meadow*
- *Native Scrub*
- *Ornamental Scrub*
- *Rain Garden*

5.72 Further strategies of the landscaping plan will utilise a green roof on the amenity building that is to reduce glare and provide habitable areas.

5.73 These landscaping strategies have been assessed by the relevant ecology and drainage consultants who are working on this application. This is to ensure that the landscaping plan can deliver the requirements set out in the ecology and drainage statement.

5.74 Furthermore, as detailed within the arboricultural sections of this Statement, policy 52 has been achieved as the application will retain the existing protected trees as part of the scheme and ensure that any development is outside of the root protection area.

5.75 It is considered that the landscaping proposals are of a nature that will ensure that the MRA can enhance the wider landscape of the site and not impact on any landscape of visual risks. Due to the sites requirements for having a fit for the future ethos, then the development is compliant with policies 51 and 52. The deliverance of these strategies will assist with setting the new standard for delivering roadside facilities and enhancement of the landscape for future proposals.

Transport

- 5.76 Core Policy 60 states the Council will implement its planning powers to support and encourage the sustainable, safe and effective movement of people and goods within and through Wiltshire.
- 5.77 Core Policy 61 states that new development should aim to reduce the need for private car travel, encourage sustainable transport modes and provide consideration for all different methods of transport.
- 5.78 Core Policy 62 states that development should provide appropriate mitigation to offset any adverse impacts on travel and should not be accessed directly off the national primary route, unless an over-riding need can be demonstrated.
- 5.79 Core Policy 65 states that the Council will seek to achieve a sustainable freight distribution system which includes the provision of overnight lorry parking within the vicinity of the advisory freight network and encourage the HGV traffic to travel on the advisory freight network.
- 5.80 Core Policy 66 states that work will be undertaken to improve the strategic transport network, this includes national primary route network.
- 5.81 With respect to Core Policy 61, the significant provision in EV charging provision provides a greater choice for road users to travel via sustainable modes of transport.
- 5.82 With regard to Core Policy 65, the development's location on the SRN eliminates further risk of inappropriate HGV parking and overnight lorry parking, within an area of clearly identified need.
- 5.83 The development provides a direct improvement to the functioning of the strategic road network through the provision of roadside service facilities in a location where there is an identified need for such facilities. The development is therefore deemed to comply with Core Policy 60 and 66. In addition, the pre-application document confirmed that National Highways viewed the location as well-sited in relation to the SRN and recognised the need for freight facilities within the area.
- 5.84 The pre-application response stated that a formal application should include further information to understand the 'trip profiles' for all elements of development. This data is included within the Transport Assessment.
- 5.85 To address this request, a Transport Assessment has been prepared by Eddisons. A number of conclusions are drawn from the Transport Assessment, these are:
- The proposed development will be served by safe and efficient vehicular access arrangements.
 - The proposed development would be sufficiently accessible for staff to travel to the Site by non-car travel modes, such as, walking, cycling and public transport.
 - The development will be supported by a Staff Travel Plan.
 - The traffic impact of the proposals is not considered severe.
- 5.86 The Site will not become a destination in its own right. It's purpose is to meet the safety and welfare needs of road users that would otherwise already be travelling on the SRN. As a result, trips generated by pedestrians would also be limited. The proposal includes a potential link to a footway outside the southern boundary of the Site, adjoining the B4005, which will allow for enhanced pedestrian connectivity from the Site and nearby public transport links. These works are deemed as

improvements to the highway and will be agreed through discussions with the Applicant, Council and Highways Department.

- 5.87 In addition, the road network currently experiences low levels of local traffic. The proposed development involves the alteration of existing highway, B4005, to provide an access roundabout in the south-east section of the Site. This would be a new 55 metre ICD roundabout. The access roundabout is designed to accord with highways design standards, allowing for sufficient capacity to accommodate proposed traffic levels. Post-permission, a separate Section 278 agreement will be entered into with the Local Highways Authority to undertake the works involving the new roundabout.
- 5.88 For these reasons, the impact of the development on traffic would not give rise to adverse impacts on the functionality of the surrounding roads.
- 5.89 The proposed parking provision aligns with the requirements of the Circular 01/2022, as is demonstrated in Table 2 below.

Table 2: Circular 01/2022 Parking Requirements against Proposed Parking Levels		
Parking Type	MRA Parking Requirement	Proposed Parking
Cars – 0.5% of A	226	241
HGV – 1.0% of B	60	62
Abnormal Loads – Minimum of 1	1	1
Coach – 0.1% of B	6	6
Caravan/Motorhome – 0.015% of A	7	7
Motorcycle – 0.015% of A (minimum of 10)	7	12
Disabled car users – 5% of car spaces (minimum of 5)	11	11
Disabled Caravan – 5% of spaces (minimum of 1)	1	1

Data has been calculated by Eddisons (2023) in line with DfT Circular 01/2022.

- 5.90 In addition to this section of the Statement, Chapter 5 of the ES and its associated appendices provide the necessary detail to confirm that the proposed development will not lead to detrimental impacts on the surrounding transport networks. The scheme's compliance with relevant local plan policies

has also been outlined. It is therefore considered that the application is acceptable in terms of transport impacts.

Ecology

- 5.91 Core Policy 50 sets out the requirements of new development in respect to the protection and enhancement of ecology and biodiversity.
- 5.92 The Site, as existing, scores low in regard to its biodiversity value. However, it does contribute to habitats of higher biodiversity value in the locality, such as the Monk Rest Woodland Trust Reserve.
- 5.93 The proposed development will deliver a circa 12.5% net gain in biodiversity, which includes the net gain of +2.47 habitat units and +0.61 hedgerow units. As mentioned above, this will be secured through the provision of suitable planting and habitat creation that will be delivered as part of the proposed landscaping scheme and through the effective management of the land east of the site to a good quality. This will be secured through legal agreement with Wiltshire Council to ensure that this land is managed in the long term achieving the required BNG.
- 5.94 The application is supported by extensive survey work which establishes the potential impacts of the development, during the construction and operational phases, on protected species and their habitats.
- 5.95 During the construction phase the main impact demonstrated is through habitat loss. The accumulation of the habitat features is of medium sensitivity and loss of habitats would be of moderate magnitude resulting in an effect of intermediate significance. As such, various habitat enhancement strategies will be used during the site clearance with further protection for foraging bats through effective management of temporary lighting.
- 5.96 All protection measures will be detailed within a CEMP that will be produced as part of any future application. This will ensure that there is to be a negligible residual impact during the construction phase resulting in a neutral effect.
- 5.97 Within the operational phase of development, through the landscape plans and creation of habitats on site. These habitats are provided through green roofs, planting of trees, scrub and areas of species rich grassland. These provide effective mitigation strategies for the development and ensure that the development will result in a minor positive long term residual effect.
- 5.98 Key issues that arose from the survey work carried out on site concerned the reduction in foraging opportunities for nesting habitat for birds and increased light pollution. The habitat creation proposed as part of the development ensures that nesting areas are provided across the site for sparrows, starlings, and swifts. Additionally, the installation of lighting has been designed to effectively reduce any impacts on foraging bats. The lighting design has been completed by SKR lighting through the guidance of the Ecologists.
- 5.99 Additionally, through regular monitoring of the habitat proposal and effective management strategies, the site will continue to deliver the BNG net gain through the operational phases of the development. As such, the application demonstrates that it is in accordance with Core Policy 50 of the adopted Wiltshire Core Strategy.

Flooding and Drainage

- 5.100 Core Policy 67 'Flood Risk' states that all new redevelopment will need to include measures on how the proposals will reduce rate of rainwater run-off and implement infiltration, unless deemed unviable by ground conditions.
- 5.101 Core Policy 68 'Water Resources' states that developments must not prejudice River Basin or Catchment Management Plans and that non-residential development are required to display how water efficiency measures have been incorporated as part of the scheme.
- 5.102 The Site is located within Flood Zone 1 and also lies in area which is at Very Low Risk of Surface Water Flooding.
- 5.103 The assessment within Chapter 9 of the ES that was completed by Pell Frischmann, focussed on the construction and operational phases of development and the proposed risks.
- 5.104 For the construction phases the assessment criteria reviewed the impacts on:
- Changes to Natural Drainage Regime
 - Pollution Risk
 - Flood Risk Impacts
- 5.105 This assessment stated that during this phase of the application, there would be a minor adverse impact on the Natural Drainage, a moderate adverse impact on Pollution Risk and minor adverse risk to Flood Risk. It is stated that this stage of development would adhere to a completed CEMP that would ensure that all stages of construction are managed to ensure that all mitigation strategies are completed.
- 5.106 The operational phase of this development was subject to the following assessment criteria:
- Impact on Run off Quantity
 - Impact on Run off Quality
 - Flood Risk Impacts
 - Foul Sewerage
 - Water Supply
- 5.107 The impact on the Runoff Quantity from this development is to be Minor beneficial as the implementation of the SuDS would allow for the management of volume discharge of water into watercourses downstream.
- 5.108 The Runoff Quality is also a beneficial part of this application as the drainage system will ensure that there is no greater risk to the surface water runoff not existing watercourses. Figure 8 has been extracted from Chapter 9 and displays the mitigation indices as part of the drainage strategy. This represents that there is sufficient levels of treatment delivered on site.

SuDS Component	Mitigation Indices		
	Total Suspended Solids	Metals	Hydrocarbons
Permeable Paving	0.7	0.6	0.7
Swales	0.5	0.6	0.6
Detention Basin	0.5	0.5	0.5
SuDS Mitigation Calculation	$0.7 + 0.5(0.5) + 0.5(0.5)$	$0.6 + 0.6(0.5) + 0.5(0.5)$	$0.7 + 0.5(0.5) + 0.5(0.5)$
SuDS Mitigation Index	>0.95	>0.95	>0.95
Land Use Pollution Index	0.8	0.8	0.8

Figure 8: SuDS Mitigation Indices extracted from Chapter 9 of the Environmental Statement

- 5.109 There is no expected risk to the foul sewerage from this development and the foul flows for this site and an additional flow of sewerage will result in a minor adverse impact. It is also evidenced that there is to be no risk posed to the Water Supply from this development as a minor adverse effect was scored as part of the assessment.
- 5.110 In addition to the assessment in the Environmental Statement, Pell Frischmann have also completed a Sustainable Drainage Report and a Flood Risk Assessment for the Site. These documents conclude that the proposed drainage scheme and mitigation measures will ensure that the development will not increase flood risk elsewhere in the locality or give rise to adverse drainage impacts.
- 5.111 As such, it has been concluded that the construction and operational phase of the development will result in a minor adverse and minor beneficial minor beneficial to the environment and the implementation of the drainage plan as demonstrated within the Sustainable Drainage Report, ensure that this development is appropriate and in accordance with Core Policy 67 and 68.

Arboriculture

- 5.112 A group Tree Preservation Order (TPO ref: N/TPO51), is located over three separate points within or close to the Site. The TPO was created in 1975. Figure 4 outlined the broad location of the TPO earlier in this Statement.
- 5.113 Core Policy 51 states that developments should take measures to enhance locally distinctive features, such as trees and hedgerows.
- 5.114 Core Policy 57 requires developments to retain important natural features as part of proposals, these include trees and hedgerows.
- 5.115 Policy NE14 of the Saved Local Plan Policies states that permission will not be granted for applications that involve the loss of important natural features (i.e. trees, hedges) that are deemed to be important to the landscape.
- 5.116 To ensure that the proposed development did not lead to detrimental impacts on the existing mature vegetation at the Site, an Arboricultural Impact Assessment & Arboricultural Method Statement (AIA/AMS) has been prepared by Patrick Stileman Ltd.

5.117 The AIA begins by investigating whether there are any protected (TPO'd) trees on the Site. The AIA compared the Council's mapping of TPOs against the trees present at the Site and draws the conclusion that any trees, previously protected by the TPO, are no longer present.

5.118 The AIA also includes a survey of the existing trees to establish their condition. The survey identified 17 individual trees, 3 tree groups, and 7 hedges at the Site. Trees were then ranked by the following ratings.

- U: Trees unsuitable for retention
- A: Trees of high quality
- B: Trees of moderate quality
- C: Trees of low quality

5.119 No trees were found to be of high quality, with the majority being moderate. Figure 9 below has been extracted from the AIA and outlines the quality of trees at the Site.

Classification (BS5837)	Number
U	4
A	0
B	13
C	10

Figure 9: Extract from AIA showing tree quality

5.120 Overall, the proposed development would only necessitate the removal of a small number of low-quality trees from the Site. The AIA concluded that the minor works proposed to trees and the additional planting as part of the development would be acceptable. The AMS outlines measure to prevent unnecessary/unplanned harm to existing trees as the development is built out.

5.121 For these reasons, the proposed development is acceptable in terms of its impact on existing trees. Only a small quantity of low quality trees will be removed from the Site to facilitate to the development and appropriate measures can be put in place to protect any trees that would be retained.

Heritage and Archaeology

5.122 Core Policy 58 'Ensuring the Conservation of the Historic Environment' states development should protect, conserve and wherever possible enhance the historic environment.

5.123 The pre-application response states that the Site was located within an area of 'good archaeological potential' and also located in a position with three designated heritage assets within a 1km radius of the Site. Due to this, the Officer requested that a full submission would be accompanied by a Heritage Statement, that also includes archaeological analysis of the Site.

5.124 Paragraph 194 of the NPPF states that in determining planning applications, local planning authorities require the Applicant to describe the significance of any heritage asset affected by development. Additionally, Paragraph 195 states that the Council should identify and assess the significance of a heritage asset impact by development and take this into account when considering any potential impact.

- 5.125 Smith Jenkins Planning & Heritage, with Archaeological Surveys Ltd, have prepared a Heritage & Archaeology Assessment to accompany the planning application. This Statement outlines the known the historic land uses of area surrounding the Site from 900,000 BC to Present Day and summarises the likely impacts of development.
- 5.126 The Site has had a consistent association with agricultural farming, with desk survey data showing very low levels of archaeological interest at the Site. To confirm this, a geophysical survey was undertaken at the Site. Data from this survey confirmed the desk survey and deemed the Site to have low amounts of archaeological interest.
- 5.127 As mentioned there are three designated heritage assets within 1km of the Site. These are:
- Upper Studley Farmhouse (Grade II);
 - Studley Grange Farmhouse (Grade II); and
 - Milestone Near Spittleborough Farm, at NGR SU 095828 (Grade II).
- 5.128 Section 4 of the Heritage & Archaeology Assessment deals with Paragraph 194 directly and provides detail into the significance of each of the three heritage assets listed above. Upper Studley Farmhouse and Studley Grange Farmhouse are both concluded to gain significance due to the age and located into an open agricultural landscape. The Milestone is deemed to have significance due its historic role in aiding the travel of individuals.
- 5.129 Due to the distance between the assets and the Site, in addition to the intervening landscape, it was concluded that the setting of the two Farmhouses would experience very minimal impact. Additionally, the Milestone is located within an open setting and adjacent to a common transportation route and therefore the setting would not be impacted by development. The assessment also notes that the green roof to the amenity building and natural screening between the Site and the heritage assets will significantly reduce any impact.
- 5.130 With support of the Heritage & Archaeological Assessment, this Statement concludes that the proposed development exhibits very minimal impacts on designated heritage assets and would not disturb land of high archaeological value. The proposed development is deemed to comply with Local and National planning policy and therefore considerable acceptable in relation to heritage and archaeology.

Lighting

- 5.131 Core Policy 51 and 57 both states that the design of developments must take measures to protect the surrounding area from the impacts of light pollution.
- 5.132 The application is supported by an Exterior Lighting Survey, Design & Calculation Report, prepared by SKR Lighting Design.
- 5.133 The report analyses the existing light levels at the Site through desktop and primary surveys. Desktop surveys demonstrate that existing light levels experienced at the site are between 8 and 32 NanoWatts/cm²/sr, classifying the area as a 'brighter' location and a suburban location, in terms of light levels.
- 5.134 As all matters are reserved aside from access, a detailed lighting scheme has been proposed for the site or its access with the B4005. However, an inductive lighting specification has been prepared.

5.135 These lighting details propose:

- Access Roundabout: 8m, 2200k 'very warm white' columns – fitted with daylight sensing, dusk to dawn.
- Internal Mini-Roundabout: 8m, 2200k 'very warm white' columns – fitted with daylight sensing, dusk to dawn.
- Site Boundary: 8m, 2700k 'warm white' columns – fitted with daylight sensing, dusk to dawn and blocking baffles to reduce any excess light spill.
- Car and Caravan Parking: 8m, 2700k 'warm white' columns – fitted with daylight sensing, dusk to dawn.
- Coach Parking: 8m, 2700k 'warm white' columns – fitted with daylight sensing, dusk to dawn.
- HGV Parking: 12m, 2700k 'very warm white' lighting columns;
- Amenity Building: 2700k 'warm white' surface mounted downlights – fitted with dimming controls as time changes;
- Service Yard: Building mounted floodlight and 8m columns, both fitted with 2700k 'warm white';
- Petrol Filling Station: 2700k 'warm white' ceiling recessed high-output downlights – fitted with lighting control systems based on activity; and
- Footpaths: 1m bollard 2700k 'warm white' columns – fitted with daylight sensing, dusk to dawn.

5.136 The lighting scheme aims to embrace the semi-rural nature of the Site. SKR have selected 'warm' lighting specifications and have orientated columns so as to minimise the spill of light pollution. Figure 10 below has been extracted from the Exterior Lighting Survey, Design & Calculation Report, this shows the anticipated lighting levels within the Site.

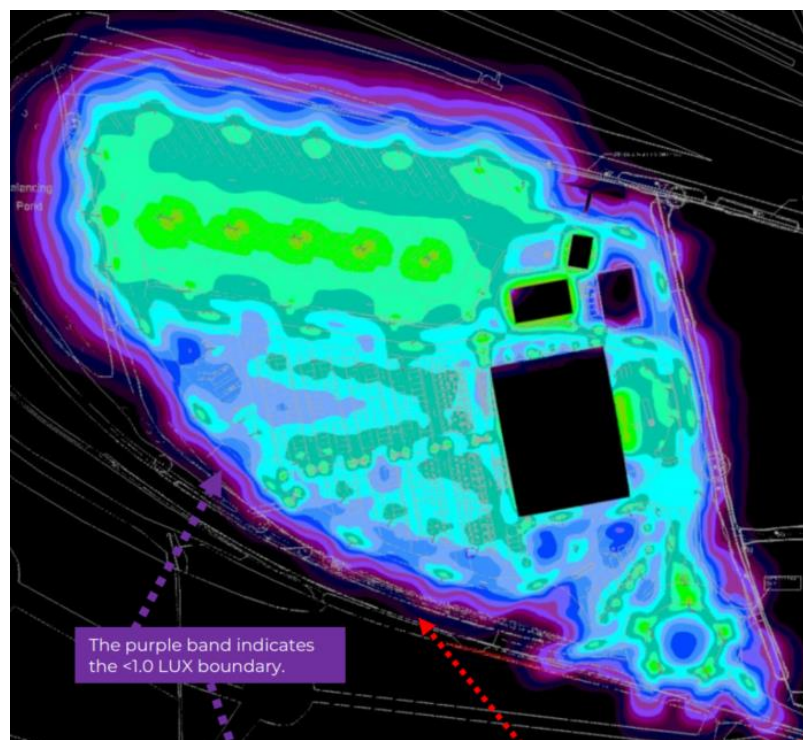


Figure 10: Extract from exterior lighting survey, design & calculation report showing anticipated light spill

5.137 The lighting scheme has also been designed to meet BREEAM standards. Further to this, areas of important ecological habitat have been identified and addressed accordingly.

- 5.138 The proposed lighting scheme is therefore considered to be acceptable. The scheme proposes a sympathetic lighting design, in an area that is currently recognised as a 'brighter' area. The scheme would not lead to any adverse impacts into lighting pollution of the area and will also lead to increased safety on the highway and activities on Site.
- 5.139 This Statement therefore concludes that the proposed lighting scheme is policy compliant and deemed acceptable in terms of lighting impacts.

Air Quality

- 5.140 Core Policy 55 'Air Quality' states proposals must demonstrate that measures of mitigation have been effectively undertaken to protect public health, environmental quality and amenity in relation to the quality of air. These measures should demonstrate how positive contributions will be made to the aims of the Air Quality Strategy for Wiltshire and Wiltshire Air Quality Action Plan, when necessary.
- 5.141 To effectively address the concerns of Core Policy 55, Cass Allen were instructed to conduct detailed surveys of the existing air quality levels and recommend the mitigation measures to ensure that unacceptable harm to air quality would not arise as part of development.
- 5.142 Chapter 9, Figure 1 and Appendices 7.1 to 7.6 of the Environmental Statement have been prepared by Cass Allen and outline the full methodology and recommendations. Recommended mitigation measures were listed in Appendix 7.3.
- 5.143 Cass Allen's assessment was split over the construction and operational phases of development. During the construction phase, the assessment concluded that the development would have low risk without any mitigation measures and even lesser risk following the implementation of mitigation measures. The anticipated impacts of construction phase were found not to be significant. Regarding the operational phase of the development, the assessment determined that the impact to all existing receptors would be negligible and that the impacts of the development were not significant.

Noise

- 5.144 Core Policy 57 seeks to ensure that all developments are designed to a high quality and respect the amenity of neighbouring developments, this includes protection from unacceptable levels of noise and vibration.
- 5.145 To ensure the proposed development would not lead to adverse increases in noise and vibration, Cass Allen were appointed to conduct an assessment of the Site. An assessment in the potential impacts from the proposed development have been prepared as Chapter 6 of the Environmental Statement.
- 5.146 Cass Allen conducted an initial noise survey on the 9th and 11th of August 2023 to establish the baseline noise level and background noise levels at potentially noise sensitive locations nearby. The survey uncovered that the general noise within the area are dictated by the M4 and B4005 roads.
- 5.147 Chapter 6 then assesses the anticipated changes to noise levels, mitigation measures set to be put in place and the impacts within the construction and operation phases of development. Cass Allen state that road traffic noise is anticipated to increase, with or without development, due to increased road traffic. These changes are however set to lead to no overall change in noise impacts.

- 5.148 To ensure that amenity to the Travellers' Site on Hay Lane is not adversely impacted, eastern areas of the Site have been omitted of any noise generating uses. Due to the outline nature of the application, further noise mitigation will be included as part of the detailed design of development.
- 5.149 Chapter 6 states that Negligible impacts are anticipated in the Construction phase due to the Site's distant location from identified noise receptors. In addition, Chapter 6 also concludes that there will be negligible or no change in:
- Operational Effects of Mechanical Plant;
 - Operational Effects of Changes in Road Traffic Noise;
 - Operational Effects of Airborne Noise Affecting the Proposed Development; and
 - Operational Effects of On-Site Vehicle Movements on Existing Receptors.
- 5.150 Section 6.6 of the Noise and Vibration chapter details the additional mitigation measures that are set to be implemented during the construction phases of development. The implementation of these measures are deemed sufficient to lead to no more than negligible impacts in construction and operation.
- 5.151 It is therefore considered that the proposed development is compliant with Core Policy 57a and has successfully mitigated any potential impacts in relation to noise and vibration.

Mineral Safeguarding

- 5.152 Policy MCS 6 & MDC 4 'Safeguarding Mineral Resources, Rail-head Facilities and Mineral Recycling Facilities' seek to ensure that development does not impact on the Mineral Safeguarding Area or impact on current and future mining operations.
- 5.153 The site is located within a Mineral Safeguarding Area and so as part of the application GWP have completed a Mineral Resource Safeguarding Assessment. This report has concluded that the site has been allocated as a Mineral Safeguarding Area due to the volume of clay within the site. It states that the proposed development will not cause impacts to viable mineral resources. The Report concludes that the development does not conflict with the Wiltshire and Swindon Minerals Development Control Policies Development Plan Document, and specifically policies MCS 6 and MDC 4.

Scheme Consultation

- 5.154 As highlighted earlier in this Statement, the Applicant engaged in pre-application discussions with the Council prior to the submission of this application. Elements of the Council's response to the pre-application discussions have been incorporated into the scheme where appropriate. All requests for additional information made during the pre-application discussions have been satisfied.
- 5.155 Public engagement remains an important aspect of Moto's ethos. Community consultation was conducted in the weeks leading up to submission. A Statement of Community Involvement (SoCI), is submitted as part of the application.
- 5.156 As part of the engagement process, Moto have created a consultation website, undertaken in-person surveys, issued a leaflet drop to impacted neighbours, promoted social media engagement and provided direct contact to key stakeholders (including MPs, Cabinet members, ward councillors and parish councils).

- 5.157 To thoroughly engage and communicate the scheme, the Applicant has offered the opportunity for relevant stakeholders to meet in person or via Teams to meet with the design team. Such meetings have included meetings with stakeholders and planning committees at Royal Wootton Bassett and Wroughton Town Council.
- 5.158 The engagement process has been extremely successful in understanding the views of the surrounding community on the potential for the a motorway rest area in this location. The overriding response recognised the need additional HGV and EV charging facilities in this area.
- 5.159 Where possible, the Applicant has incorporated recommendations of stakeholders within the design. Dev Comms have prepared a full SoCI which further discloses the methodology and findings of the engagement process.

Environmental Statement

- 5.160 The application is accompanied by an ES (and associated Non Technical Summary) that assessing the environmental effects of the proposed development. This ES was created in order to produce a robust planning application and demonstrate the sustainable approach and environmental mitigation of the project despite a negative screening opinion obtained from Wiltshire Council.
- 5.161 The topics (those which have the potential to give rise to significant environmental effects) further assessed are addressed as part of the ES within the relevant technical chapters are as follows:
- Chapter 5: Traffic and Transport;
 - Chapter 6: Noise and Vibration;
 - Chapter 7: Air Quality;
 - Chapter 8: Landscape and Visual;
 - Chapter 9: Hydrology and Flood Risk; and
 - Chapter 10: Ecology.
- 5.162 As required by the EIA Regulations, the likely effects of the development and the likely effects of other developments in the geographical area of the Site have been considered in order to determine the likelihood of cumulative effects.
- 5.163 The ES has conducted an assessment of the proposed development in relation to the scoped areas that have potential for environmental concern. These have been assessed through the chapters listed above and their findings have been summarised in this Statement.
- 5.164 When necessary, the appropriate mitigation measures have been proposed and the likely impacts during the construction and operational phases of development has been minimised. The ES then concludes:

‘the majority of adverse operational and construction effects identified can be appropriately mitigated or compensated and reduced to a level which is not considered to be significant.’

The proposed development is therefore deemed to have an acceptable environmental impact, with any potential adverse impacts being adequately addressed through embedded or additional mitigation measures.

6 Summary and Conclusions

- 6.1 This Statement has been prepared in support of a planning application for a new MRA on the Land at Junction 16 (M4), Swindon. This application follows engagement with the Council through pre-application discussion and EIA Screening.
- 6.2 This Statement recognises that by virtue of its location outside of defined settlement limits, the proposed development is in conflict with Core Policies 1 and 2 of the Wiltshire Core Strategy. However, this Statement has sought to demonstrate that there are significant, weighty considerations associated with the application which overcome the conflict with these policies and justify the grant of planning permission.
- 6.3 As has been outlined above, these considerations include:
- Addressing the need, both locally and nationally for additional HGV spaces;
 - Addressing the need, both locally and nationally, for additional EV charging spaces;
 - Delivering significant net gains in on-site biodiversity which exceed both current and future local and national policy requirements;
 - The provision of job opportunities for the local population and significant investment into local business, education and charitable organisations;
 - Exceptional design and construction methods, including the provision of an amenity building built to BREEAM Excellent standard.
- 6.4 Cumulatively, these material considerations are deemed to demonstrably outweigh the conflict with Core Policies 1 and 2 of the Wiltshire Core Strategy and the harm that this conflict generates. In the absence of any other harms arising from technical issues associated with the proposed development, it is concluded that, in the planning balance, the application is acceptable.
- 6.5 For the reasons set out in this Statement, and supporting documents, it is therefore requested that this application is approved by the Council without undue delay.