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**MINERAL RESOURCE SAFEGUARDING ASSESSMENT -
LAND AT JUNCTION 16 OF M4 MOTORWAY, SWINDON**
For
MOTO HOSPITALITY LTD

September 2023

Report Title: Mineral Resource Safeguarding Assessment - Land at Junction 16 of M4 Motorway, Swindon

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CONTENTS

1.	INTRODUCTION	1
2.	ASSESSMENT OBJECTIVE	1
3.	MINERAL SAFEGUARDING PLANNING POLICY	1
3.1	National Planning Policy Framework (NPPF) 2021.....	1
3.2	Wiltshire and Swindon Minerals Core Strategy and Development Control Policies.....	1
4.	REVIEW OF AVAILABLE INFORMATION	2
5.	THE DEVELOPMENT SITE	3
5.1	Location	3
5.2	Geology.....	3
5.2.1	<i>Bedrock geology</i>	3
5.2.2	<i>Superficial geology</i>	3
5.3	Mineral Safeguarding Area.....	3
6.	MINERAL RESOURCE ASSESSMENT.....	3
7.	SUMMARY AND CONCLUSIONS.....	4

DRAWINGS

Drawing Number	Drawing Title	Version
J16MOTO2309-1	Site location	b
J16MOTO2309-2	Bedrock geology	b

APPENDICES

Appendix 1	Drawing No. M49_101-G
Appendix 2	Mineral safeguarding area drawings

MINERAL RESOURCE SAFEGUARDING ASSESSMENT - LAND AT JUNCTION 16 OF M4 MOTORWAY, SWINDON

1. INTRODUCTION

Moto Hospitality Ltd is planning to develop a new Motorway Rest Area on land at Junction 16 of the M4 motorway, Swindon. The proposed development comprises 241 No. car parking spaces, 63 No. heavy goods vehicle parking spaces, additional vehicle parking and a 2500m² amenity building with associated soft and hard landscaping.

GWP Consultants LLP (GWP) has been instructed by Smith Jenkins (Planning Consultant), acting on behalf of Moto Hospitality Limited to complete a mineral resource assessment of the proposed development site within the context of Mineral Safeguarding Planning Policy.

This report provides details of the mineral resource safeguarding assessment completed and the associated findings.

2. ASSESSMENT OBJECTIVE

The objective of the mineral resource safeguarding assessment is to establish whether or not it is likely that a potentially valuable mineral resource will be sterilised by the proposed development.

3. MINERAL SAFEGUARDING PLANNING POLICY

3.1 National Planning Policy Framework (NPPF) 2021

Section 17.210 of the NPPF (2021) states that planning policies should:

- c) *safeguard mineral resources by defining Mineral Safeguarding Areas and Mineral Consultation Areas; and adopt appropriate policies so that known locations of specific minerals resources of local and national importance are not sterilised by non-mineral development where this should be avoided (whilst not creating a presumption that the resources defined will be worked);*
- d) *set out policies to encourage the prior extraction of minerals, where practical and environmentally feasible, if it is necessary for non-mineral development to take place.*

A Mineral Safeguarding Area is defined as 'an area designated by mineral planning authorities which covers known deposits of minerals which are desired to be kept safeguarded from unnecessary sterilisation by non-mineral development.'

The objective of mineral safeguarding is to avoid the sterilisation of potentially valuable mineral resources by non-mineral development.

3.2 Wiltshire and Swindon Minerals Core Strategy and Development Control Policies

The Mineral Planning Authority is Wiltshire Council.

The Wiltshire and Swindon Minerals Core Strategy 2006 – 2026 (MCS) was adopted in June 2009 and the Wiltshire and Swindon Minerals Development Control Policies Development Plan Document (MDC) was adopted in September 2009.

MCS Policy MCS6 – Safeguarding Mineral Resources, Rail-head Facilities and Mineral Recycling Facilities

In establishing, monitoring and reviewing Mineral Safeguarding Areas (MSAs) the Councils will work with the minerals and waste industries, land owners and other local planning authorities to safeguard the following assets from potential sterilisation by other forms of development:

- *Mineral Resource Zones;*
- *All existing active and dormant minerals sites;*
- *Land within 1km of active and dormant mineral sites;*
- *Sites for future mineral working allocated within DPDs;*
- *Operational land associated with existing and proposed Mineral Recycling Facilities; and*

- *Operational land associated with the existing Rail Aggregate Depot at Wootton Bassett and any proposed new rail-head facilities and sidings.*

MDC Policy MDC4 – Safeguarding Mineral Resources, Rail-head Facilities and Mineral Recycling Facilities

Proposals for development within Mineral Safeguarding Areas, as defined on the Proposals Map, that may prevent or adversely affect current or possible future mineral extraction and/or associated ancillary operations, rail-head facilities, and mineral recycling facilities within Wiltshire and Swindon will be opposed 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.*

4. REVIEW OF AVAILABLE INFORMATION

A review of the following sources of information has informed this mineral resource assessment:

- British Geological Survey (BGS) Onshore GeoIndex.
<https://mapapps2.bgs.ac.uk/geoindex/home.html>
- Records of boreholes held by the BGS.
- Mineral Resource Information in Support of National, Regional and Local Planning – Wiltshire (comprising Wiltshire and the Borough of Swindon). BGS 2004.
<https://nora.nerc.ac.uk/id/eprint/509636/>
<https://nora.nerc.ac.uk/id/eprint/535207/1/wiltshireMap.pdf>
- National Planning Policy Framework (revised 20.07.2021).
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf
- Wiltshire and Swindon Minerals Core Strategy 2006 – 2026 (Adopted in June 2009)
<https://www.wiltshire.gov.uk/media/8546/minerals-core-strategy-june-2009/pdf/minerals-core-strategy-june-2009.pdf?m=637804441195500000>
- Wiltshire and Swindon Minerals Development Control Policies Development Plan Document (Adopted in September 2009)
<https://www.wiltshire.gov.uk/media/8551/minerals-development-control-policies-dpd-September-2009/pdf/adopted-minerals-development-control-policies-dpd-2009-september.pdf?m=637804446834470000>
- Wiltshire and Swindon Waste Core Strategy 2006 – 2026 (Adopted in July 2009)
<https://www.wiltshire.gov.uk/media/8548/waste-core-strategy-july-2009/pdf/waste-core-strategy-2009-july.pdf?m=637804444234270000>
- Wiltshire and Swindon Minerals Development Control Policies Development Plan Document (Adopted in September 2009)
<https://www.wiltshire.gov.uk/media/8553/waste-development-control-policies-september-2009/pdf/adopted-waste-development-control-policies-dpd-2009-september2009.pdf?m=637804447882670000>

- A guide to mineral safeguarding in England. BGS. October 2007.

<https://nora.nerc.ac.uk/id/eprint/7508/1/OR07035.pdf>

5. THE DEVELOPMENT SITE

5.1 Location

The site is located immediately to the southeast of Junction 16 of the M4 motorway and is approximately centred on NGR 410480 182670 (see Drawing No. J16MOTO2309-1). The site covers an area of c. 7.27ha and currently is in agricultural use.

The site is bordered to the north and the south by the M4 motorway and the B4005 respectively and residential dwellings are located c. 175m to the east of the site.

The layout of the proposed development is shown on Drawing No. M49_101-G prepared by Beech Design and provided in Appendix 1.

5.2 Geology

5.2.1 *Bedrock geology*

Information available from the BGS indicates that the bedrock geology underlying the site and the surrounding area is mudstone belonging to the Kimmeridge Clay Formation and the underlying Amphill Clay Formation (see Drawing No. J16MOTO2309-2). The Amphill Clay Formation is underlain by limestone/sandstone strata belonging to the Corallian Group.

The records of boreholes held by the BGS give evidence that the combined thickness of the Kimmeridge Clay Formation and the underlying Amphill Clay Formation within the vicinity of the site is c. 25m.

5.2.2 *Superficial geology*

Information available from the BGS indicates that there are no superficial deposits underlying the site or present within the immediately surrounding area.

5.3 Mineral Safeguarding Area

Mineral safeguarding areas are shown on the Wiltshire and Swindon Minerals Core Strategy Key Diagram and, more clearly, on the Development Framework Proposals Map. Both of these drawings are provided in Appendix 2 and have been annotated to show the location of the site.

The site, in its entirety, lies within a mineral safeguarding area. Given the local geological setting, it is evident that the area has been safeguarded due to the presence of clay associated with the Kimmeridge Clay Formation and the underlying Amphill Clay Formation.

6. MINERAL RESOURCE ASSESSMENT

As noted above, the area within the vicinity of the site has been safeguarded due to the presence of clay associated with the Kimmeridge Clay Formation and the underlying Amphill Clay Formation.

Within Wiltshire, clay minerals resources are safeguarded in localised areas having regard to the use of clay in the following applications:

- Cement production.
- Engineering applications.

With regard to cement production, clay mineral resources are safeguarded within the vicinity of Westbury Cement Works.

With regards to engineering uses, clay is used for the construction of engineered clay landfill lining and capping systems at the following non-hazardous and hazardous landfill sites:

- Sands Farm Landfill, Lower Compton, Calne SN11 8RB (Hills Waste Solutions), located c. 14km to the southwest of the site.
- Parkgate Farm Landfill, Swindon SN5 4HG (Hills Waste Solutions), located c. 6km to the north of the site.

- Park Grounds Landfill, Royal Wootton Bassett SN4 8DW (Crapper and Sons Landfill Ltd), located c. 5km to the west of the site.
- Studley Grange Landfill, Swindon SN4 9QT (Biffa Waste Services Limited), located c. 0.75km to the south of the site.

Within the vicinity of the site, the clay is safeguarded for landfill lining engineering purposes.

Within the context of this mineral resource safeguarding assessment, it is important to note that the clay used for landfill lining engineering purposes at landfill sites is excavated at the sites themselves *i.e.* the clay is not excavated elsewhere and imported.

Given its location in close proximity to existing residential dwellings to the east, there can be no reasonable expectation that the site would ever gain planning permission for development either as a non-hazardous or hazardous landfill site or as a stand-alone clay quarry, given that operation of the landfill or quarry would have an unacceptably high environmental impact on sensitive receptors in terms of noise, dust, odour (landfill) and visual intrusion. The site is not identified as an allocated mineral or waste site in the Wiltshire and Swindon Minerals/Waste Site Allocations Local Plans.

On this basis, GWP concludes that the safeguarded clay at the site has no mineral resource value for either:

- landfill lining engineering purposes at the site; or
- extraction on any viable and operationally practicable scale for use at another site for landfill lining engineering purposes.

Accordingly, it is considered that:

- an appropriate quantity of mineral cannot be reasonably extracted prior to or in phase with the proposed non-mineral development;
- the mineral deposit is unlikely to be worked.

(MDC Policy MDC4 refers).

Having regard to the above, GWP concludes that no viable mineral resource would be sterilised by the proposed development. Notwithstanding, it is recommended that any clay excavated during the groundworks undertaken for the proposed development, which is surplus to on-site requirements (*e.g.* for landscaping), is not classified as a waste, is not disposed of to landfill and is made available for export from the site for landfill lining engineering purposes.

7. SUMMARY AND CONCLUSIONS

GWP Consultants LLP has completed a mineral resource safeguarding assessment of the proposed new Motorway Rest Area on land at Junction 16 of the M4 motorway, Swindon.

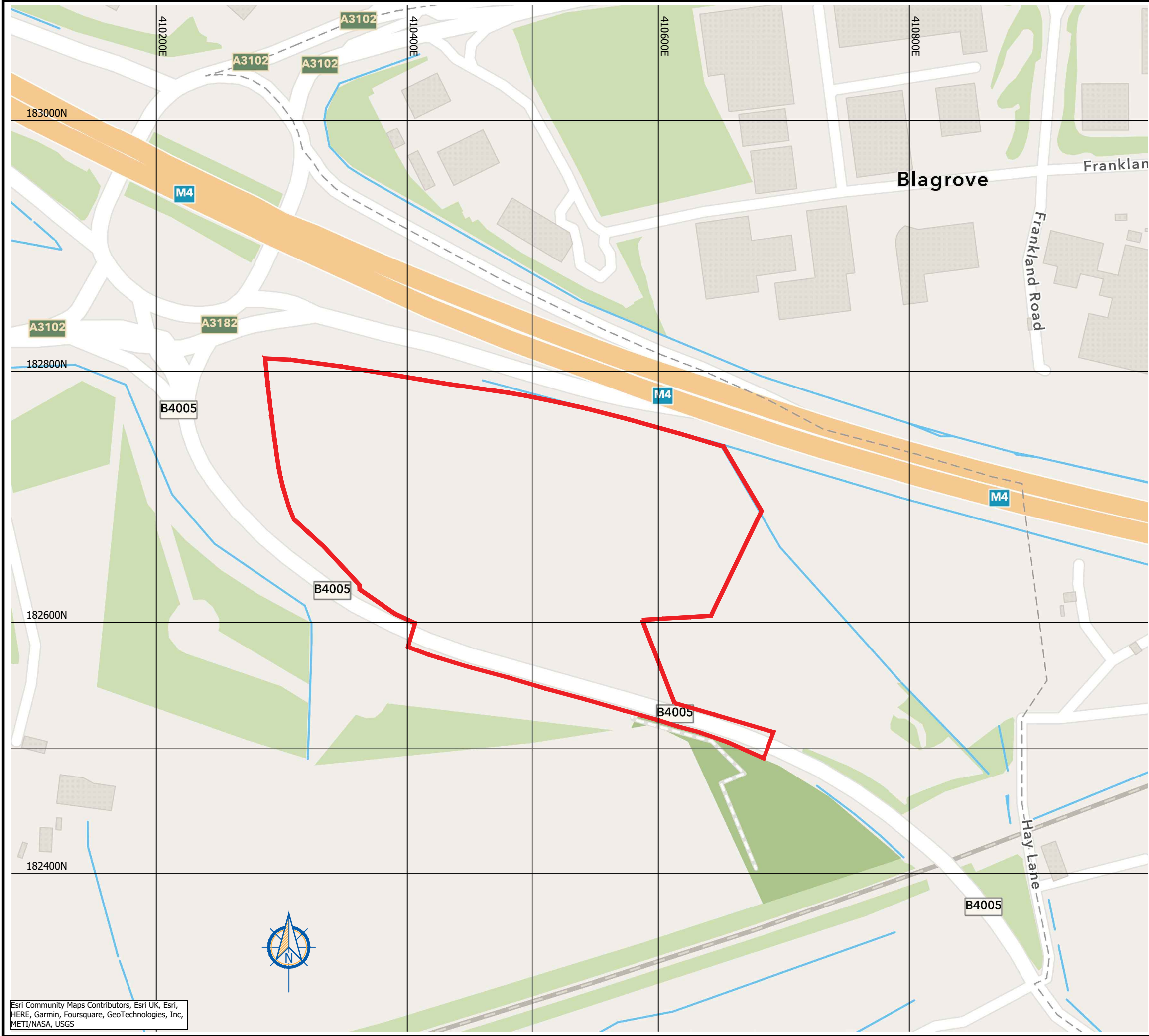
This report provides the details and findings of the mineral resource safeguarding assessment.

Notwithstanding that the site lies within an area which is safeguarded due to the presence of clay, GWP concludes that no viable mineral resource would be sterilised by the proposed development.

It is recommended that any clay excavated during the groundworks undertaken for the proposed development, which is surplus to on-site requirements (*e.g.* for landscaping), is not classified as a waste, is not disposed of to landfill and is made available for export from the site for landfill lining engineering purposes.

Having regard to the findings of this mineral resource safeguarding assessment, GWP considers that there would be no basis for an objection to the proposed development to be made under Paragraph 210 of the National Planning Policy Framework or Policy MCS6 of The Wiltshire and Swindon Minerals Core Strategy 2006 – 2026 or Policy MDC4 of the Wiltshire and Swindon Minerals Development Control Policies Development Plan Document.

GWP CONSULTANTS
SEPTEMBER 2023



LEGEND



Site boundary

Version	Revision and compilation notes	Date
a	Issued	11.09.2023
b	Issued	12.09.2023

Client
Moto Hospitality Ltd

Project
Land at Junction 16 of M4 Motorway - Mineral Resource
Safeguarding Assessment

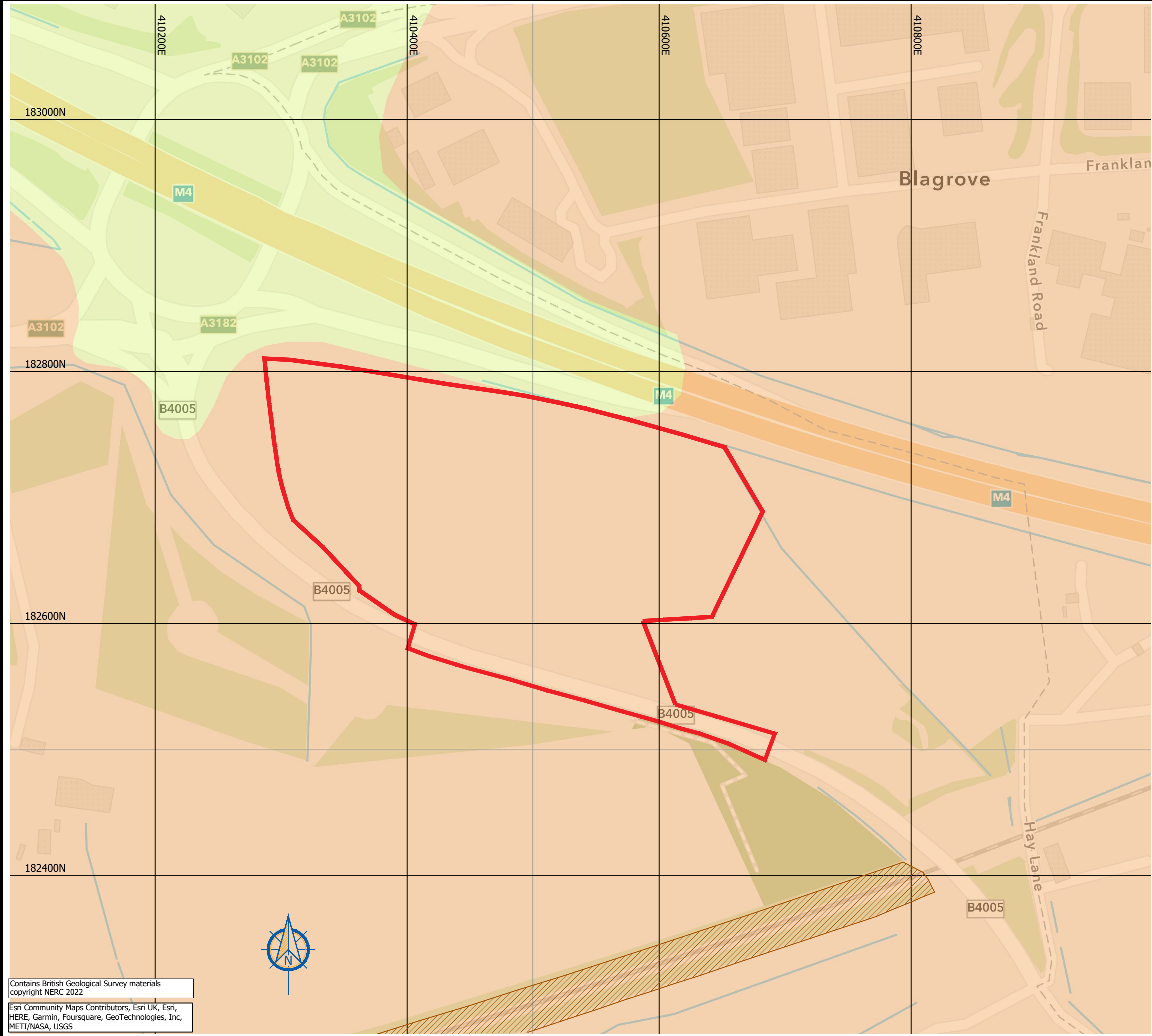
Site location



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earth & water resources			
Date 12.09.2023	Drawn EMB	Checked MP	Scale 1:3000 at A3
Drawing Ref J16MOTO2309		Drawing No 1	Version b

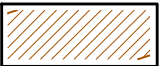
Esri Community Maps Contributors, Esri UK, Esri, HERE, Garmin, Foursquare, GeoTechnologies, Inc, METI/NASA, USGS



LEGEND



Site boundary



Artificial ground

Bedrock geology



Kimmeridge Clay Formation - mudstone



Ampthill Clay Formtion - mudstone

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earth & water resources			
Date 12.09.2023	Drawn EMB	Checked MP	Scale 1:3000 at A3
Drawing Ref J16MOTO2309		Drawing No 2	Version b

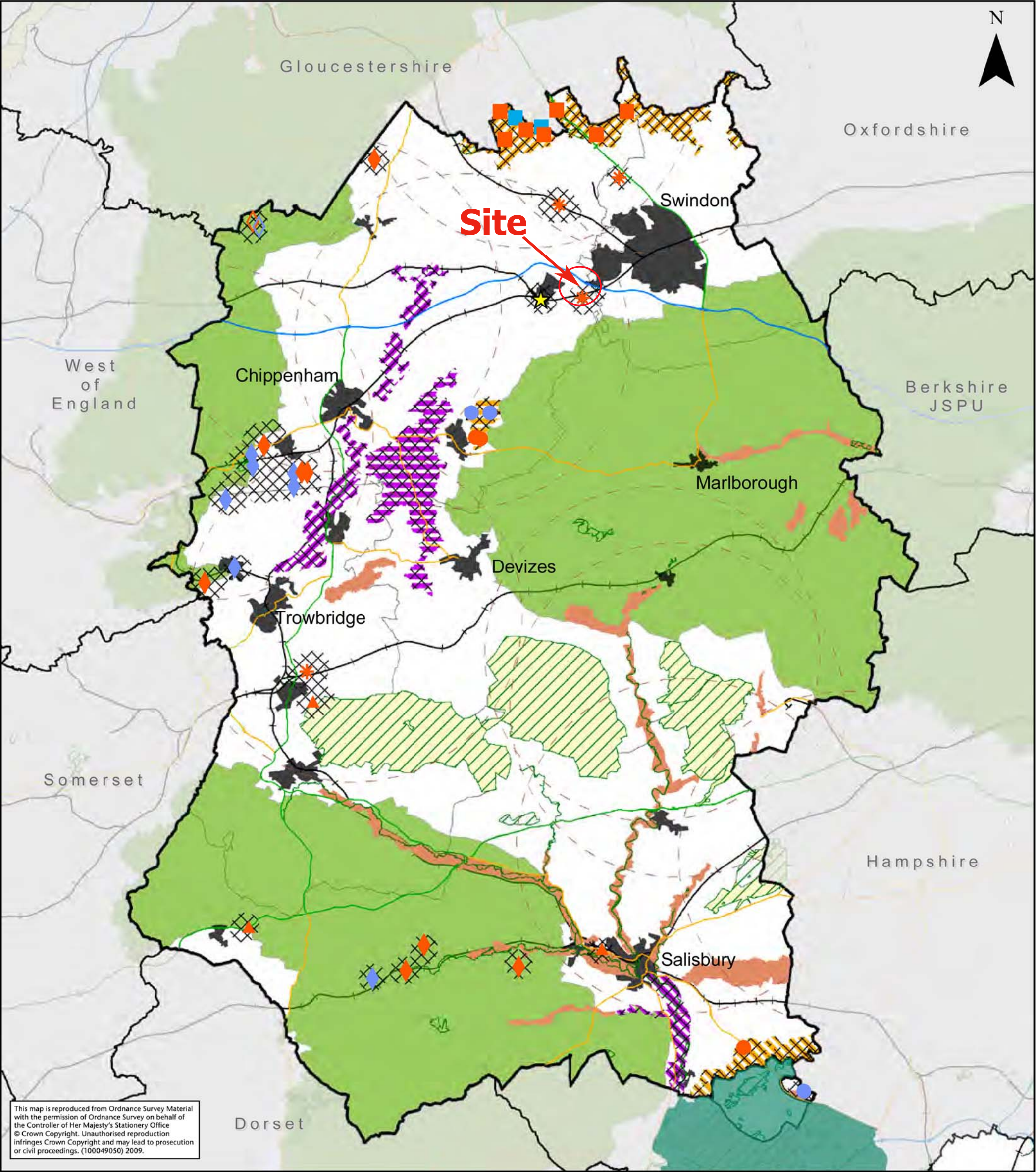
APPENDIX 1

Drawing No. M49_101-G

APPENDIX 2

Mineral safeguarding area drawings

Minerals Core Strategy Key Diagram



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Key

Existing Minerals Sites (MCS 2 & MCS 6)

- Rail Aggregate Depot (Crushed Limestone)
- Building stone, Active
- Building Stone, Dormant
- Stone(agg), Dormant
- Crushed Rock, Active

- Chalk, Active
- Clay, Active
- Sand and Gravel, Active
- Sharp sand and gravel, Dormant
- Soft Sand, Active
- Soft Sand, Dormant

Mineral Resource Zones (MCS 1)

- Bristol Avon
- East of Calne
- Salisbury Avon
- South East of Salisbury
- South and West of Calne
- Upper Thames Valley

Other Naturally Occuring Resources

-

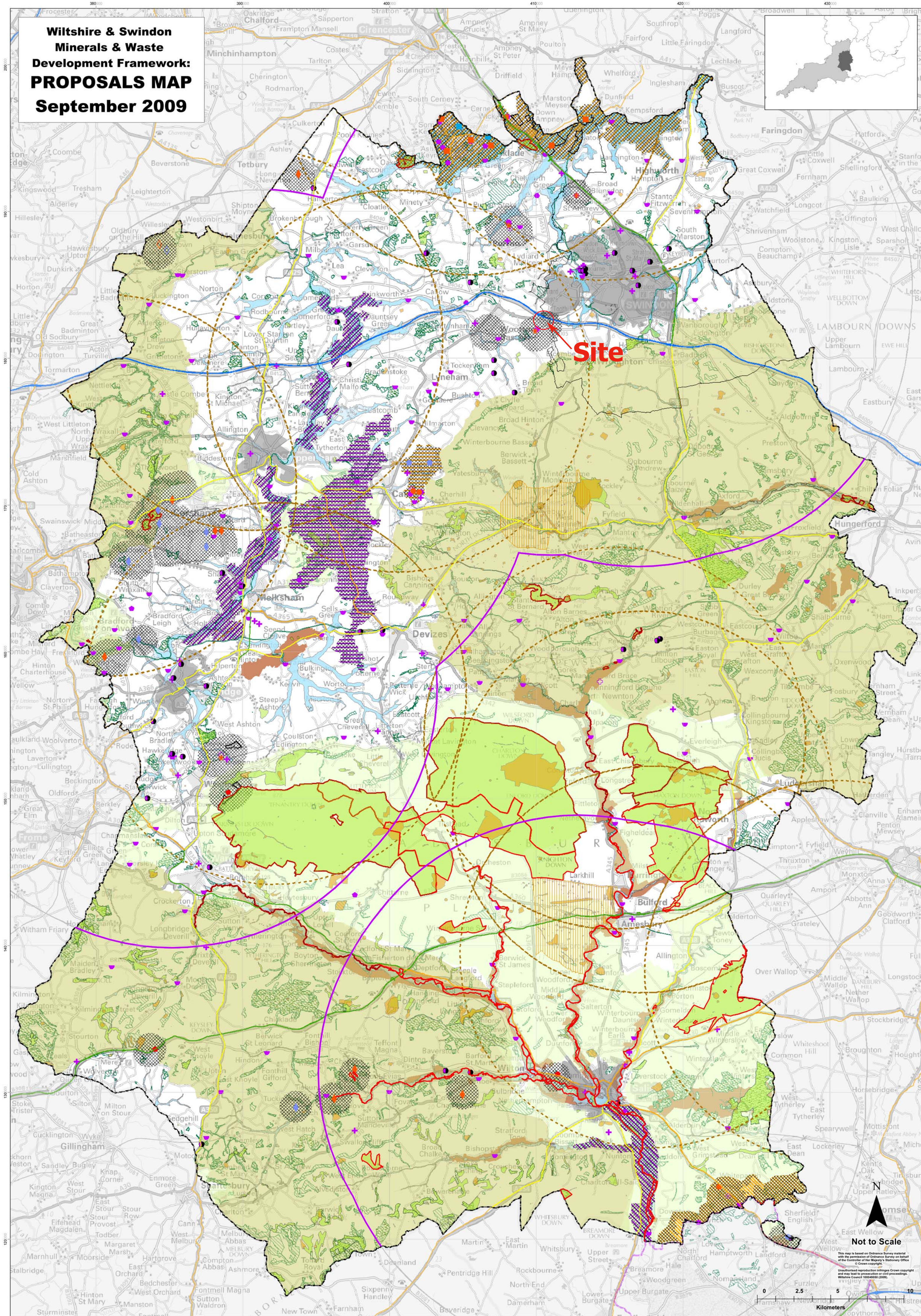
- Airfield Safeguarding (MCS 10)
- Mineral Safeguarding Area (MCS 6)
- New Forest National Park
- Special Areas of Conservation
- Area of Outstanding Natural Beauty
- Special Protection Areas
- Settlements
- Plan Area

Wiltshire HGV Route Network (MCS 9)

- Motorway
- Strategic Lorry Route
- Local Lorry Route

Railways

-



Key to Symbols

- RSS SSCT 16km Radius Area of Search
- Wiltshire and Swindon Border
- New Forest National Park Authority
- Strategically Significant Cities and Towns

Sites of International & National Importance

- Sites of Special Scientific Interest
- European Designated Sites (SPA & SAC)

Landscapes of National Importance: Policy MDC5; Policy WDC7

- Areas of Outstanding Natural Beauty

Landscapes of Local Importance

- Special Landscape Areas

Sites of Local Nature Conservation Importance: Policy MDC6; Policy WDC8

- Regionally Important Geological Sites
- County Wildlife Sites

Heritage:

- World Heritage Sites

Archaeological Protection: Policy MDC7; Policy WDC9

- Scheduled Ancient Monuments

Water Environment: Policy MCS7; Policy MDC3; Policy WDC3

- Environment Agency Flood Zone 2
- Environment Agency Flood Zone 3

Airfield Safeguarding: Policy MCS10; Policy MDC10; Policy WDC6

- Aerodrome Safeguarding Zones

Transport: Policy MCS 9; Policy MDC8; Policy WDC11

- Primary Route Network
- Wiltshire HGV Route Network
- Motorway
- Strategic Lorry Route
- Local Lorry Route

Sites of Nature Conservation Importance: Policy MDC6; Policy WDC8

- Ancient Woodland

Existing Minerals Sites: Policy MCS2; Policy MCS6; Policy MDC4

- Building Stone, Dormant
- Building stone, Active/temp inactive
- Stone(agg), Dormant
- Crushed Rock, Active/temp inactive
- Chalk, Active/temp inactive
- Clay, Active/temp inactive
- Sharp sand and gravel, Dormant
- Sand and Gravel, Active
- Soft Sand, Dormant
- Soft Sand, Active

Existing Waste Sites: Policy WCS2; Policy WCS3; Policy WCS4

- waste processing, operational
- waste processing, Non-Operational
- hazardous, operational landfill
- Sewage, operational
- Scrapyards, operational
- Non-hazardous, operational landfill
- Non-hazardous, non-operational
- Inert, operational landfill
- Inert, non-operational ; Inert, non-operational

Mineral Resource Zones: Policy MCS9

- Bristol Avon
- East of Calne
- Salisbury Avon
- South East of Salisbury
- South and West of Calne
- Upper Thames Valley

- Mineral Safeguarding Area (Policy MCS 6; Policy MDC4)
- Minerals Preferred Areas MLP Policy 35 & 49