

19 October 2023

Development Management
Wiltshire Council
County Hall
Bythesea Road
Trowbridge
BA14 8JN

Our Ref: 715
Planning Portal Ref: PP-12188920

Dear Sir,

Land at Junction 16(M4), Swindon

“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.”

On behalf of our client, Moto Hospitality Ltd, we have today submitted via the Planning Portal (reference: PP-12188920) the above planning application.

The application comprises the following documents:

- This letter;
- Application forms incorporating Certificate B;
- Drawing ref. M_001 Rev E – Site Location Plan;
- Drawing ref. M_002 Rev E – Existing Site Plan;
- Drawing ref. M49_101 Rev G – Proposed Layout Plan (Illustrative) [not a formal application drawing];
- Drawing ref. M49_110 Rev C – Parameters Plan;
- Drawing ref. M49_115 Rev B – Illustrative Masterplan [not a formal application drawing];
- Drawing ref. 3728-F04 rev E – Proposed Site Access Plan, prepared by Eddisons;
- Design and Access Statement, prepared by Beech Design;
- Planning Statement, prepared by Smith Jenkins;
- Environmental Statement (Volume 1 and 2 and Non Technical Summary), prepared by Tetra Tech, incorporating the following technical appendices:
 - Air Quality Modelling and Reports, prepared by Cass Allen;
 - Landscaping Details, prepared by IDP;
 - Ecological Habitat Surveys, prepared by Ecology by Design;
 - Flood Risk Assessment, prepared by Pell Frischmann;
 - Sustainable Drainage Report, prepared by Pell Frischmann;

- Transport Assessment, prepared by Eddisons;
- Biodiversity Impact Assessment, prepared by Ecology by Design;
- Biodiversity Metric 4.0, prepared by Ecology by Design;
- Heritage and Archaeological Assessment, prepared by Smith Jenkins;
- Arboricultural Impact Assessment & Arboricultural Impact Statement, prepared by Patrick Stileman Ltd;
- Exterior Lighting Survey, Design & Calculation Report, prepared by SKR Lighting;
- Sustainable Construction and Energy Statement, prepared by SDA;
- BREEAM Sustainability Champion Report, prepared by Encon Associates;
- Agricultural Land Quality Considerations, prepared by Kernon Countryside Consultants;
- Mineral Resource Safeguarding Assessment, prepared by GWP Consultants; and
- Statement of Community Involvement, prepared by DevComms.

The required application fee of £18,056.00 has been paid via the Planning Portal. Please confirm receipt of the application and associated fee.

Background and Content of the Application

The application site currently comprises an agricultural field, as outlined in the Planning Statement and Design & Access Statement. The site is located directly off Junction 16 of the M4 Motorway and immediate site access will be taken off the B4005 road.

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.

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 B) 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 reports submitted with the application, and the Environmental Statement, have been based on these details. Additionally, a Parameters Plan has been submitted as a formal application drawing that the Environmental Statement is based upon.

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.

Pre-application discussions were undertaken between the Council and the applicant from September 2022 to February 2023. These discussions related to a specific HGV Park with 199 HGV spaces, 66 electric vehicle parking spaces, 1x abnormal load space, 1x coach space, 1x caravan space, amenity building, HGV fuel filling station, and drive thru building with parking. Since this time, the scheme has

evolved to now propose a Motorway Rest Area (MRA) ,with a greater number of parking spaces and few HGV spaces.

This application is submitted following a Screening request dated 15 June 2023 and the subsequent response 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.

Purpose of the Application

The main purpose of this application is to provide a purpose built MRA in an area of identified need. An MRA is a small service area facility that has half the parking requirements of a standard Motorway Service Area. As per the Circular 01/2022, it is mandatory for an MRA to:

- 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;

The proposed development will provide a facility that includes all the above. As well as this, the development can address identified shortfalls in HGV and electric vehicle (EV) parking in this region and section of the Strategic Road Network (SRN). Moto are committed to ensuring that HGV and EV parking are provided at high levels across the country and focus their priority to locations that are in particular need. Moto have carefully selected the site as the best location to serve these needs.

Nationally there is a shortfall of 4,473 HGV parking spaces (National Lorry Parking Survey – Part 1: 2022). Circular 01/2022 states that in areas where the National Lorry Parking Survey identifies a specific need for increased HGV parking provision, dedicated facilities should be located at no increments no more than 14 miles. Results from the National Lorry Parking Survey locates the proposed development as being within an area of ‘critical’ need for HGV parking. Combined with its advantageous position adjacent to the SRN, the site can successfully cater for the shortfall in dedicated facilities, as currently experienced.

Through the Rapid Charging Fund in March 2020, National Government announced a commitment to ban the sale of conventionally fuelled cars and vans by 2030 and HGVs by 2040. To make this ambition a reality, it is the duty of Council’s across England to ensure that the necessary infrastructure is in place to support this increase in non-conventionally fuelled vehicles on the road. The proposed development will provide 50 EV charging spaces from Day 1, with all remaining car and HGV spaces capable of being upgraded to provide EV charging capabilities. The proposed development represents a big step forward in preparing the SRN for the future and enabling the Government’s objectives. The need for these spaces is particularly evident in the south-west. The south-west is rated 6th lowest region in the UK for EV devices per 100,000 population.

In addition to providing much needed parking spaces for both HGV and EV vehicles, Moto are committed to providing a development that has overarching ecological, socio-economic and sustainability objectives. Such benefits of the scheme include:

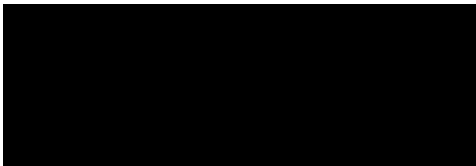
- Significant net gains in on-site biodiversity;
- Increased job opportunities for local residents during construction and operational phases of development;
- Significant investment into local business, education and charitable organisations; and
- High levels of design and construction including an amenity building built to BREEAM Excellent, a recognised certification of exceptional design quality; and
- Enhanced availability of services to support the safety and welfare of users of the strategic road network.

The submitted drawings and Design & Access Statement illustrate the proposed scheme in greater detail, the Environmental Statement and other various technical reports consider key considerations. The Planning Statement then assesses the proposed scheme against the Development Plan, the National Planning Policy Framework and other material planning considerations.

The Planning Statement concludes that there is demonstrable need for the development and that planning permission should be issued without delay.

Should you have any queries please do not hesitate to contact me.

Yours faithfully



Nick Jenkins MRICS

Director
Smith Jenkins Ltd

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