

Memo

To: Planning Services
From: Transport Development Management
Date:

Application Number: PL/2023/09142

Proposal: 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.

Location: Land at Junction 16 (M4), Swindon

Thank you for inviting Highways & Transport comment on the above application to develop land close to Junction 16 for a motorway rest area (MRA). The application is in outline, with the means of access to be determined.

The application is supported by a package of documents and I will refer to those where appropriate. Most relevant to my consideration of the proposals is the Transport Assessment (TA), Version 3, dated 3rd October 2023.

The application site is situated entirely within Wiltshire, as is the proposed access junction. I have not therefore considered the results of capacity assessment in any detail. Given however the importance of the B4005 as a link to the strategic road network from Wroughton and the new development in southern Swindon (Wichelstowe), I have made some comment on the adequacy of the access proposals. In respect of impact at Junction 16, I will make no detailed comment on the potential for impact other than a high-level assessment of the potential for congestion on the A3102 Great Western Way north of the motorway.

The TA, at Chapter 2, addresses the need for an MRA at this location. I support the principle of delivering a facility that offers attractive overnight parking facilities for goods vehicles but question the broader strategy underlying this proposal. I am unclear as to whether the facility is - or might be - intended to offer a Swindon gateway facility and whether that particular operating model might fundamentally impact on the assessment work presented in support of the proposals? If a gateway function is not an inherent element of the business model, I am concerned that the facilities on offer may lead to such a 'gateway' characteristic developing over time in any event. I would be grateful for evidence of the consideration of this potential effect and the potential benefits or disbenefits of the facility to Swindon Borough.

The description of the development at Chapter 3 of the TA is limited and does not assist me in understanding the potential for the development to be an attractor of trips in its own right. The Planning Statement advises that *'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'*. The Circular states that hot drinks and cooked hot food is permitted at an MRA but I remain unsure as to how the amenity building might be utilised, beyond providing the toilet facilities mandated by the Circular. With a footprint of some 2,200m², the amenity building is only marginally smaller than the facility at Membury Services and I am assuming that a similar range of shopping outlets will be provided here, including potentially a modest high-end food retail unit.

It is worth noting too that the electric vehicle charging facilities and lorry-stop facilities may attract a wider user-base than just those passing on the motorway.

My reading of the Circular suggests that the difference between an MRA and a service area is the range of facilities on offer and I am unclear as to why this facility is classified as an MRA rather than an MSA. The relevance in the subtle difference in definition will become evident below.

Section 3.5 of the TA sets out the proposed parking strategy, with the Planning Statement confirming the intention to offer:

- 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.

The proposal to deliver 62 goods vehicle parking spaces appears robust but I am unsure as to whether the function of the facility – potentially as a gateway facility to Swindon – is reflected in the calculations. In respect of car parking, the calculations at Appendix 2 to the TA confirm the values set out at Table 3.1 of the TA. The assessed demand for car parking, shown in Table 3.1 to be 226 car parking spaces, is seen to be 50% of the requirement for an MSA as set out in the Circular. Depending on whether the proposed facility effectively functions as an MSA, there may be a requirement to provide car parking at double the level proposed.

The parking demand assessment methodology set out in the Circular is clear and simple in its suggestion that parking demand is directly related to mainline flow on the motorway. Whilst I accept the principle of a correlation, I wonder whether there might be another methodology available to validate this assumption. The TA identifies at Section 2.6 that HGV parking facilities at existing MSAs/MRAs across the region are inadequate in their capacity. Does similar data exist for car parking? Given the layout of the proposed site and the short 'run-off' from the roundabout, a shortfall in car parking can be expected to give rise to congestion on the access roundabout, with an impact on the safety and amenity of through-traffic on the B4005.

I accept that the proposed facility is intended to offer services to drivers and that accessibility by non-car modes is limited to those who work at the site. That does not however mean that the needs of those who are reliant on travelling to the site on foot, by bicycle and by public transport can be ignored. The TA, at section 5.2, identifies the need to supplement the existing pedestrian infrastructure to provide a continuous route to the application site. It is stated (para 5.2.3) that the applicant is *'content to explore'* the provision of the missing footway that is identified by the applicant's Transport Consultant. I suggest that the applicant should be obliged to deliver this piece of infrastructure.

The TA concludes that the application site is accessible by bicycle, on the basis solely that some residential areas lie within a 40-minute cycle time and that the NCN45 is 2km from the site. I appreciate the limited opportunities to enhance the attractiveness and safety of cycling to the site but wonder whether the new footway identified above might realistically be provided as a shared footway/cycleway. On the matter of bus services, you may wish to consider whether it is appropriate to secure improvements to the two bus stops that cater for services between Swindon and Royal Wootton Bassett.

Chapter 7 of the TA presents the assessment of traffic impact and I need to clarify that the statement at para 7.2.2 is not accurate. At no point did I agree that the assessment of traffic impact should be limited to Junction 16 and the site access junction. Indeed, my response to the Screening Opinion stated that *'I have made it clear through the informal discussions to date with the developer's agent that the scope of the TA may – depending on the development make up – need to include assessment of impacts beyond Junction 16.'*

The TA considers traffic impacts but contains little evidence of any strategy to manage demand for the facility, particularly by goods vehicles. I would ask that a Logistics & Servicing Plan is submitted to indicate the way in which strategic demand for the facility, by goods vehicles, might be managed. On a related point, I feel it reasonable that a part of this strategy for managing demand includes a contribution towards the Swindon Local Logistics Partnership.

The treatment of committed development is set out at Section 7.5 and I note that development at Wichelstowe (the Southern Town Expansion) is included within the assessment. I appreciate that some of the traffic flow likely to originate from the full build-out of the strategic site has been accounted for within the 2023 Reference Case flows – estimated to be 24% of the planned total – but I am confused as to how the Wichelstowe traffic is accounted for in the derivation of design flows. Figure 7, when setting out the assumed committed development flows in the AM peak hour, shows Wichelstowe traffic reasonably reduced by this 24%. Figure 8 however, which shows the PM committed development flows, shows negative flows attracted towards Wichelstowe. I have asked the applicant's Transport Consultant to explain this but to date, I have received no response.

I dispute the contention (para 7.5.5) that *'... full 4500 dwellings may never be realised on the site due to changes which have occurred during subsequent reserved matters applications'* and consider the assumptions made regarding Wichelstowe traffic to be realistic, rather than robust.

In assessing the quantum of traffic flow attracted to the proposed MRA, the forecasting appears to be based on a 'trip rate per parking space' value, derived from other MSAs in the region. I question the reliability of this methodology and why a trip rate per floor area has not been considered. The suggestion is that the proposed facility at Junction 16 would generate 500 and 660 vehicle movement in the AM and PM peak hours respectively because the car park is smaller than that at Membury Services, which is a similar size in terms of built development and is seen to generate 1,470 movements and 1,960 movements in the AM and PM peak hour respectively. Establishing the likely quantum of vehicle traffic is critical and I do not believe that this has been done with any degree of confidence.

On the matter of potential impacts beyond Junction 16 and the proposed site access, Section 7.9 of the TA suggests that 7% of all traffic attracted to the proposed development will be 'local' and not originating on the motorway. This proportion is guided by a survey undertaken at an MSA in Ferrybridge. With no information either relating to the likely configuration of the proposed 'amenity building' or that at Ferrybridge, I am unable to assess whether the Ferrybridge facility is a reliable proxy for the proposed facility at Junction 16. I would ask that a more site-specific assessment is undertaken of the potential for local trip generation, taking account both of potential demand for charging infrastructure by residents and particularly businesses based in Swindon and more strategically, the gateway potential of the proposed facility.

Notwithstanding the accuracy of the 7% 'local trip' proportion or the doubts, set out above, of the total traffic that would be attracted to the proposed facility, Tables 7.10 and 7.11 of the TA suggest that the quantum of local traffic would be of the order of 36 vehicles in the AM peak hour and 46 in the PM peak hour. The distribution of these vehicle trips is shown in Figures 15 and 16, which indicate approximately 50% of local trips to originate to the southeast of the facility (Wroughton and Wichelstowe), 35% from Swindon in the north and 15% originating in Royal Wootton Bassett. The rationale behind this distribution is not explained, particularly when different proportions might reasonably be expected for car and HGV journeys.

Assessment of the operation of the proposed new access junction shows it to be operating close to its effective capacity in 2033. I set out above my concerns for the robustness of the trip number forecasts informing that assessment but would further point out that the fourth arm of the proposed roundabout is assumed to serve no traffic-generating development. As that land lies within Wiltshire, I will leave you to form your own view as to whether that is a realistic long-term assumption.

I offer no comment on the assessment of impact at Junction 16 but would ask that the effects of a material increase in HGV turning movements is considered from a design perspective. Specifically, I would hope that any effects on lane use and lane width around the gyratory is fully assessed from a safety perspective.

Whilst not directly part of my remit, I have been asked to raise the issue of drainage and a request that assessment of the drainage strategy for the site recognises the strategic drainage needs of the nearby Wichelstowe urban extension.

In conclusion, I have a number of concerns for the proposals. Fundamentally, I am unsure as to how the facility is intended to function and what role it might play in managing freight movement to and within Swindon Borough. On the basis of the applicant's business model for the site and whether the site might realistically be considered an MRA or an MSA, more specific concerns are:

- a) Whether adequate provision is made for the parking of cars and goods vehicles;
- b) Whether committed development has been adequately and accurately accounted for in assessment of impacts;
- c) Whether 'local' trip-making is adequately represented in the assessment of the proposals;
- d) Whether the potential for all traffic generation is accurate, given the role of the facility as an MRA or an MSA;

Until further information is provided to resolve the concerns set out above, on behalf of Swindon Borough Council I have no option but to recommend that the application is **refused**.

Please note that the comments made here represent Officer opinion and cannot be seen to prejudice Swindon Borough Council's formal determination in relation to any application or planning matter.

Kind Regards

Gerry

Gerry Prodöhl
Principal Transport Manager

Asset & Transport Development Management
Swindon Borough Council
Email: gprodohl@swindon.gov.uk
Tel: 07976 601395
Web: www.swindon.gov.uk