

Wiltshire Council Planning Consultation Response

Landscape

Officer name: Mark Goodwin CMLI (Senior Landscape Officer)

Date: 12.12.2023

Application No: **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.

Site Address: Land at Junction 16 (M4), Swindon

Case Officer: Olivia Tresise

Recommendations:

☐	No Comment
☐	Support
☐	Support subject to conditions (please set out below)
☒	Object (for reasons set out below)
☐	No objections

Matters Considered:

- Landscape & Visual Matters. Landscape Designations; Landscape Character; public amenity.
- Outline Parameters Plan (drawing No. M49_110 Rev: C).

Background:

The site does not have any relevant planning history, although the applicant did seek pre-application planning advice earlier this year for a HGV MRA, this has since evolved to a MRA to accommodate all types of vehicles.

Pre-application landscape planning advice was offered to the applicant, via the relevant planning case officer. As part of pre-application advice, the landscape officer raised concern that the illustrative masterplan submitted at that time did not allow enough space for screening to either the M4 or B4005 boundaries to adequately screen the development. It was considered that substantial bunding and woodland planting would be required along the boundary of the site for mitigating purposes.

The landscape officer highlighted that Membury Services 21km to the west of the site incorporated substantial tree belts to give a wooded enclosed feel to the development, and that more could have been done at Membury to break up the parking areas with blocks of tree planting to reduce the scale of the lorry parking and individual trees for the car parking. The landscape officer also highlighted as best practice Gloucester Services, where the use of green roofs, local building materials, mass tree planting and multi-functional SUDs design has provided a truly integrated development that sits well within its landscape setting, and that a similar approach that also supported the wider provision of tree planting for new development located within the Great Western Community Forest would be particularly appropriate here.

Relevant Planning Policy & Guidance:

National Planning Policy Framework (2021) & Planning Practice Guidance

- NPPF, Para. 8, Achieving sustainable development.

- NPPF, Section 12, Achieving well-designed places.
- NPPF Section 15, Conserving and enhancing the natural environment.
- PPG, Paragraph: 036 Reference ID: 8-036-20190721 - Revision date: 21 07 2019.
'The National Planning Policy Framework is clear that plans should recognise the intrinsic character and beauty of the countryside, and that strategic policies should provide for the conservation and enhancement of landscapes. This can include nationally and locally designated landscapes but also the wider countryside.'

'Where landscapes have a particular local value, it is important for policies to identify their special characteristics and be supported by proportionate evidence. Policies may set out criteria against which proposals for development affecting these areas will be assessed. Plans can also include policies to avoid adverse impacts on landscapes and to set out necessary mitigation measures, such as appropriate design principles and visual screening, where necessary.'

Wiltshire Core Strategy (2015)

- Core Policy 51: Landscape
- Core Policy 52: Green Infrastructure
- Core Policy 57: Ensuring high quality design and place shaping.

North Wiltshire District Plan (2011) – (saved policies)

Core Policy NE12: Woodland.

Core Policy NE14: Trees, Site Features and Control of new development.

Countryside & Rights of Way Act 2000 (CRoW Act 2000) - Section 85, Duty of Regard.

- 'in exercising or performing any functions in relation to, or so as to affect, land' in National Parks and Areas of Outstanding Natural Beauty (recently renamed as National Landscapes), relevant authorities 'shall have regard' to their purposes for which these areas are designated.
- This duty is particularly important to the delivery of the statutory purposes of protected areas. It applies to all local planning authorities, not just National Park authorities, and is relevant in considering development proposals that are situated outside National Park or Area of Outstanding Natural Beauty boundaries, but which might have an impact on their setting or protection.
(Planning Practice Guidance - Paragraph: 039 Reference ID: 8-039-20190721 - Revision date: 21 07 2019)

Designations:

National Landscape Designation/s

The site itself does not lie within any national landscape designation/s. The North Wessex Downs National Landscape (formerly 'North Wessex Downs AONB') lies circa 2.3km to the southwest of the site at its closest point. There is some potential for visual receptors within the National Landscape to share some intervisibility with the site due to the elevated topography of the National Landscape which rises up from the lower clay vale landscape, with some potential for the site to be visible within the wider visual setting of the National Landscape. It is likely that the site area and motorway junction would become more evident from the elevated edge of the National Landscape if the existing tree plantation located south of the B4005 were to be felled/harvested (discussed later).

Tree preservation Orders

I highlight that there are two existing tree belts located along the west and east boundaries of the site that are protected by means of a 'Tree Preservation Order' (ref: N/TPO51 (2 merged) - M4 (NO. 8

Wootton Bassett & Lydiard Tregoze). It appears as though the extent of currently proposed site perimeter bunding along the sites western boundary may have some potential to impact on the root protection area (RPA) for these trees. This should be factored into land use/land take requirements and avoided. I defer to the Council's Tree Officer to provide further advice in this regard as/if necessary.

Great Western Community Forest - The site falls within the 'Great Western Community Forest' (GWCF) plan area. The GWCF supports the principle of increased tree planting to deliver multiple benefits including improvements to landscape character at the urban fringe, increased countryside recreation and access to countryside opportunities for Swindon's urban population and outlying smaller settlements.

Comments and observations:

The site and its context

The site sits in the 'Upper Thames Clay Vales' Countryside Character Area (Natural England), located to the south of Swindon, and to the north of 'Calne Rolling Clay Lowland (11A)' of the Wiltshire Landscape Character Assessment, which is noted to be in 'good' condition, with a 'moderate' strength of character and a strategy to conserve and strengthen the landscapes inherent character.

The proposed development site lies in open countryside located adjacent to the M4 Motorway, southeast of Junction 16, which has recently been reconfigured to accommodate increased traffic flow volumes. The application site is largely devoid of any perimeter field boundary vegetation and is visually influenced by major road infrastructure comprising the elevated M4 off slip road (north of the site), leading onto the M4 Junction 16 'Spittleborough roundabout' (west of the site), and the recently widened B4005 M4 junction approach (south of the site), including associated moving and queuing traffic, highway lighting, gantries and signage. The southern urban edge of Swindon is reasonably well contained opposite the site, by existing mature vegetation running parallel with the east bound carriageway of the M4.

The application site is sandwiched between the elevated M4 Motorway and the B4005, rising in level towards the J16, M4 roundabout and shares open boundaries with these roads to give wide expansive views into and across the site.

The development site build area comprises a single agricultural field which appears to be used for grass cropping rather than direct grazing. A second smaller field which I understand is also in the applicant's control / ownership, adjoins the development site to the east, and is proposed to be used for biodiversity ecology gain/enhancement as part of the development proposal.

No Public Rights of Way would be physically impacted by the scheme, requiring diversion or to be subsumed by proposed development.

The site occupies a pressured and declining area of countryside separating Swindon from Royal Wootton Bassett. If the principle of development is supported here (due to essential association with the motorway etc) then the development should deliver a strong and effective screening landscape strategy to restrict urbanising influences and perceptual urbanising land use creep from closing the existing rural gap between settlements leading to visual and physical settlement coalescence.

Outline Development Parameters

If the principle of development is supported by the LPA at this countryside location, the following landscape matters would need to be addressed through amended outline development parameters in order to ensure the mitigation advised within the supporting LVIA is suitably secured and demonstrated to be deliverable.

1. The currently submitted outline development parameters plan (drawing ref:M49_110 Rev C) should identify and include proposed site perimeter structured tree planting areas (as this land use is not currently included on the submitted parameters plan). This development parameter should be stated as a minimum width in order to demonstrate functional effectiveness and guarantee its deliverability within any subsequent Reserved Matters application.

2. The landscape and visual mitigation strategy for a proposed new development of this nature at this site must not rely on the third-party plantation trees located opposite the site on land south of the B4005 as an essential component of the landscape and visual mitigation strategy. The site's perimeter boundaries must be additionally strengthened with native tree planting belts located on land within the applicant's ownership/control. This is considered necessary to remove the risk of future harmful visual exposure of this new urban development area fronting open countryside if/when the tree plantation is harvested at any point in the future. The incorporation of wider belts of perimeter tree planting (as recommended within pre-application landscape advice) is considered important to screen this locally exposed site from all directions. This would also support increased tree planting within the 'Great Western Community Forest' Plan Area and deliver a more sympathetic transition with countryside and contribute to creation of a strong green infrastructure corridor WCS, CP51 & 52.
3. Further assurance is also required at this stage to demonstrate that any finally agreed location for the new road access will not place any such outline development parameter (strategic landscaping) at risk of reduction in area or function in order to accommodate Local Highway Authority forward visibility splay requirements to/from the new access point (B4005), or by any necessary tree planting restrictions (required standoffs) from National Highway Authority (M4) road infrastructure, (which typically requires full tree height standoffs from active carriageways etc.).
4. Firming up the outline planning/design intent to incorporate green roofs on proposed facility buildings should be included as an additional outline development parameter requiring any future Reserved Matters submissions to deliver these. This could be achieved by simply adding this requirement to the parameters plan drawing key/legend (see below).

	Building (amenity building) (incorporating living green roof)
	Building (PFS) (incorporating living green roof)
	Building (Sub-station) (incorporating living green roof)
	Service area

Any subsequent Reserved Matters planning application will need to include full details of the hard and soft landscaping of the site, and a further condition will be required to ensure the timely delivery of any finally approved RM landscaping scheme with agreed trigger points for delivery and completion. A further condition will be necessary to ensure the landscaping scheme is appropriately maintained and managed for the life of development. This could be incorporated into a Landscape and Ecological Management Plan (LEMP) for the site.

Summary

The currently submitted outline parameters plan does not provide sufficient confidence that necessary landscape mitigation, highlighted and being relied upon within the submitted LVIA to minimise and mitigate the predicted adverse landscape and visual effects arising from this proposed development could or would be delivered alongside the amount of development being sought at this site and location.

A landscape objection is advised to be necessary, in order to protect the function and character of countryside at this location.

End.