

Memo

To: Planning Services
From: Transport Development Management
Date: 21st March 2024

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 further comment on this application for permission to develop land close to Junction 16 for a motorway rest area (MRA). I am grateful, more specifically, for the opportunity to provide further comment on the 'Response to Swindon Council Comments' document (hereinafter referred to as the 'Response Document') that you forwarded to us on 26th February 2024.

My earlier response to the application (undated) raised a number of concerns, which I summarised as:

- 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;

These concerns are informed by a more overarching uncertainty surrounding the role of the proposed facility. The Response Document begins by clarifying that the proposed facility will have no function in serving goods vehicle movements to and from Swindon on the grounds that it will only be signed from the M4. I am not convinced by this argument and suggest that freight destined for Swindon from the motorway would reasonably choose this as a location to stop before or after a visit to Swindon. I feel that assessment of this facility as if it were a traditional MRA is too simplistic and fails to recognise the significance of the facility for the Borough.

I challenged the assumption that this facility should be designed as if it were an MRA rather than an MSA, with a corresponding demand for car parking. The Response Document argues that this facility is an MRA and not an MSA, based entirely on the range of facilities that it offers. I am not content that such a critical design parameter as parking demand is not assessed in any more systematic way, rather than using typical MRA levels suggested by the Circular.

I am not comfortable, when looking at the form and scale of other MSA's, that the proposed facility is materially different in its scale or offer and would again ask for a reasoned justification as to why demand for this facility should be so significantly different to the demand for other facilities, designated MSA's, elsewhere on the M4. I had suggested a comparison of the facilities on offer here with the facilities on offer at the Membury MSA and still consider that such a comparison would be helpful in proving that what is now proposed is materially different from a nearby MSA.

The Response Note provides further argument as to why the proposed facility would not attract local car traffic and I accept the argument that local people are unlikely to be attracted to the facility for charging purposes.

On the matter of the assessment of committed development traffic, I questioned the logic of some of the underlying assumptions. I note that further work on this subject is ongoing and I look forward to seeing that.

I queried the use of a 'trip rate per parking space' as a reliable basis for impact assessment, particularly when the designation of this facility as an MRA rather than an MSA makes such a radical difference to the resulting rate. The Response Note suggests that the methodology is accepted by National Highways and by Highways colleagues at Wiltshire. If that is the case, then I will make no further comment but reserve the right to recommend refusal on those grounds.

Whilst I reserve the right to comment further at such time as the revised assessment of Committed Development traffic has undertaken, I retain the fundamental concerns that (a) this facility, as a gateway to Swindon, will generate higher than anticipated goods vehicle movement and (b) the designation of the facility as an MRA rather than an MSA, which has a major implication for both parking demand and traffic levels, is not sufficiently justified.

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

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