

From: Goodwin, Mark <Mark.Goodwin@wiltshire.gov.uk>

Sent: 24 April 2025 11:00

To: Collins, Gen <Gen.Collins@wiltshire.gov.uk>

Subject: RE: PL/2023/09142 Fw: moto J16 M4 outstanding matters (Landscaping Matters)

Dear Gen,

I have looked at the draft revised submissions and provide comment in relation to previous highlighted issues supporting a reason to object to this proposal raised in my consultation response dated 12/12/2023 as follows....

Original comment

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.

Additional comment

The revised Parameters Plan (Drawing ref: 915-205 rev E) does now include identified areas to serve as a southern site perimeter woodland buffer which offers some additional assurance to the LPA that the development could provide appropriate mitigation from within the site to mitigate direct effects of development upon countryside receptors and adjoining landscape character to the south and east of the site (over medium-longer term) at subsequent detailed design submission stage. However I highlight that the currently proposed 2m high boundary fence located at the base of the slip road extending along the northern site boundary is unlikely to be sufficient to address the concerns raised by National Highways, which at page 8 within Annex A of their consultation response (dated 28/11/2023) highlights *"The submitted Illustrative Masterplan shows limited landscape mitigation along the northern boundary of the development. The direction of travel of HGVs through the HGV parking area will therefore have the potential to create a distraction to M4 traffic from headlights and other top marker lights typically found on HGVs. We consider that the limited planting which is currently proposed would provide insufficient screening and will need to be addressed."*

And further that...*"It should be emphasised that National Highways soft estate must not be relied upon to contribute any mitigation to the development as the management of our estate may from time to time affect any real or perceived benefits. As such the developer must ensure that all required and desired mitigation is provided within the development or by a site boundary feature proposed as part of the development. We would encourage the use of native and naturalised species planting to provide or support visual screening mitigation, with an evergreen component to sustain this all year round. Any fences, screening and other structures must be erected outside of the highway boundary in accordance paragraph 57 of DfT Circular 01/2022 "The Strategic Road Network and the Delivery of Sustainable Development" and far enough*

within the developer's land to enable maintenance to take place without encroachment onto highway land."

I enclose a screenshot image from Google maps below which potentially illustrates how ineffective the currently proposed 2-metre-high northern boundary fence would likely be to achieve the required screening function for motorway traffic (note the existing timber post and rail fence running along the edge of the northern site boundary is circa. 1.2 metres high) given the existing level differences between elevated M4 slip road traffic and application site levels. This could represent a challenge for the applicant when seeking to discharge any associated condition requested/required by the Highways Authority. In my opinion the only way this could be realistically addressed would be to construct earth bunds parallel to the motorway and plant these up to provide long-term screening or construct a very high screening fence? Whether National Highways comments only relate to the Main Carriageway (more level with the site) and not the elevated west bound slip road may be a matter the applicant / LPA should clarify? This issue could significantly impact the amount of development that could be achieved within the site.

As far as I'm concerned (as WC Landscape Officer) point 1 of my original comment is satisfactorily demonstrated to be theoretically achievable for this outline planning application.



Original Comment

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.

Additional comment

This is demonstrated to be achievable over the medium and longer term by the inclusion of native woodland buffers within the revised Parameters Plan. The LPA could further condition a requirement for a landscaped woodland buffer of a specified minimum dimension necessary for screening purposes along perimeter boundary/s within any decision notice, should it be minded to approve the application. **(Issue partially resolved, see further comment under point 3 below)**

Original Comment

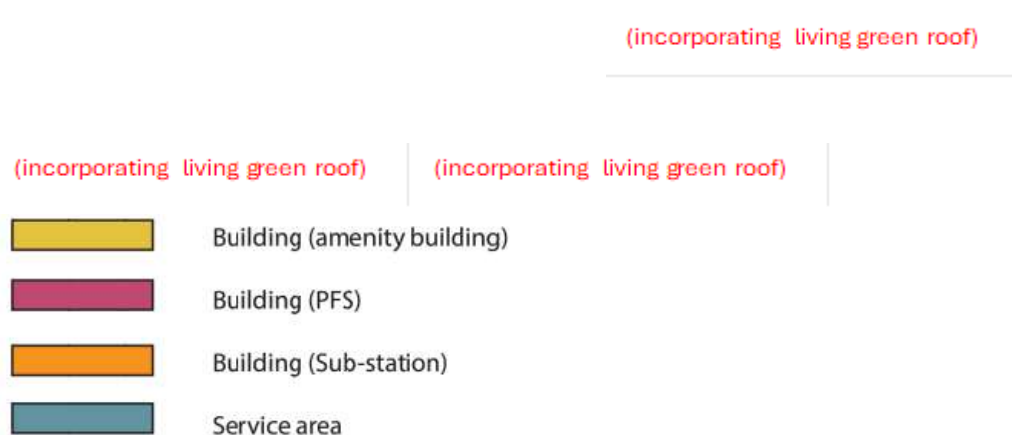
3. Further assurance is also required at this stage to demonstrate that any finally agreed location for the new road access will not place any such outline development parameter (strategic landscaping) at risk of reduction in area or function in order to accommodate Local Highway Authority forward visibility 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.).

Additional Comment

The revised Parameters Plan and Illustrative layout still don't demonstrate that the strategic screen planting proposed in proximity to the new access/roundabout could be realistically achieved without impeding required new access highway visibility splays. The easiest way to demonstrate that strategic planting is deliverable is to include the highway visibility splays for the indicative new access layout. I also highlight that any subsequent and separate tandem Section 278 (Highways Act, 1980) application/approval process may also result in removal of the currently proposed tree planting from within the new roundabout island (based on my experience). I don't believe this issue has been satisfactorily demonstrated based on the currently submitted revised plans. **(Issue is not resolved)**

Original Comment

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).



Additional Comment

While I note that green roofs are specified for various buildings within the illustrative masterplan, it is disappointing that the applicant is not prepared to commit firmly to the design intent conveyed on their illustrative plans and D&AS as a firm development parameter and key design principle within their submission. I do not consider this issue could singularly support a policy-based reason to sustain a landscape objection to this outline development proposal.

(No further action/comment)

Summary

In my opinion, the submitted revised outline parameters plan and illustrative masterplan still don't demonstrate with certainty 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 be delivered alongside the amount of development being sought at this site. Main outstanding issues are the northern site boundary / screening advised to be necessary by National Highways, and demonstration that necessary highway visibility splays at the new road access junction/roundabout off the B4055 will not require removal of the currently proposed strategic screening landscaping from the southern site boundary.

Regards

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