



National Highways Planning Response (NHPR 25-01) Formal Recommendation to an Application for Planning Permission

From: Head of Planning & Development, Operations Directorate, SW Region,
National Highways
Planningsw@nationalhighways.co.uk

To: Wiltshire Council (FAO Gen Collins)
developmentmanagement@wiltshire.gov.uk

CC: transportplanning@dft.gov.uk
spatialplanning@nationalhighways.co.uk

Council's Reference: PL/2023/09142

Location: Land at Junction 16 (M4), Swindon

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

National Highways Ref: NH/23/03529

Referring to the consultation on a planning application referenced above, in the vicinity of the M4 that form part of the Strategic Road Network, notice is hereby given that National Highways' formal recommendation is that we:

- ~~a) offer no objection with advice (see reasons at Annex A);~~
- ~~b) recommend that conditions should be attached to any planning permission that may be granted (see Annex A – National Highways recommended Planning Conditions & reasons);~~
- c) recommend that planning permission not be granted for a specified period (see reasons at Annex A);**
- ~~d) recommend that the application be refused (see reasons at Annex A)~~

Highways Act 1980 Section 175B is not relevant to this application.¹

This represents National Highways' formal recommendation and is copied to the Department for Transport as per the terms of our Licence.

Should the Local Planning Authority propose not to determine the application in accordance with this recommendation they are required to consult the Secretary of State for Transport, as set out in the [Town and Country Planning \(Development Affecting Trunk Roads\) Direction 2018](#), via transportplanning@dft.gov.uk and may not determine the application until the consultation process is complete.

The Local Planning Authority must also copy any consultation under the 2018 Direction to Planningsw@nationalhighways.co.uk.

This response and all comments outlined herein are made in respect of planning matters only in National Highways' position as a statutory planning consultee, and does not confer any proprietary rights nor amount to the giving or refusal of consent, assent, approval, or awareness of or by National Highways in or of any other aspects or matters (including, but not limited to, the use of property belonging to National Highways). If anyone wishes for National Highways to consider any aspects which do not relate to planning submissions, they should call our contact centre on 0300 123 5000.

Signature: *G Gallacher*

Date: 27 May 2025

Name: Gaynor Gallacher

Position: Assistant Spatial Planner

National Highways: Ash House, Falcon Road, Sowton Ind. Estate, Exeter EX2 7LB

¹ Where relevant, further information will be provided within Annex A.

Annex A **National Highways' assessment of the proposed development**

National Highways has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

We have undertaken a review of the relevant documents supporting the planning application to ensure compliance with the current policies of the Secretary of State as set out in DfT Circular 01/2022 "The Strategic Road Network and the Delivery of Sustainable Development" and the National Planning Policy Framework (NPPF). This response represents our formal recommendations with regards to planning application reference PL/2023/09142.

Reasons

The application is seeking consent for a new Motorway Rest Area (MRA) comprising up to 241 car parking spaces, up to 63 Heavy Goods Vehicle (HGV) parking spaces, coach and caravan parking, a facilities building, a filling station for all fuel types and associated landscaping and infrastructure works. The development is to be served by a new roundabout access from the B4005 which provides a direct connection to M4 Junction 16 (J16). The site is bounded by the J16 west-bound off-slip immediately to the north of the site.

National Highways primary consideration is for the ongoing safe and efficient operation of the M4 and J16, and it is in this context that our comments are made. In general terms, subject to being otherwise acceptable with regards safety, congestion and asset impacts, National Highways policy is to be supportive of proposals that increase and improve the facilities available for both HGVs and EV charging.

National Highways provided a detailed planning response on 28 November 2023 which provided advice and identified a number of areas where further assessment and information was required from the applicant. We recommended that the application should not be approved pending the satisfactory resolution of these matters. This recommendation was subsequently extended on 28 May and 27 November 2024, and our further extension below should be read in conjunction with those previous comments.

Primarily the outstanding issues relate to the assessment of traffic impacts and associated traffic modelling for M4 J16. The applicant's transport consultants, Eddisons, are continuing to engage positively with National Highways to resolve outstanding highways matters but more time is required to allow this work to be satisfactorily concluded.

Recommendation

National Highways recommends that Wiltshire Council not grant permission in respect of application reference PL/2023/09142 for a period of 6 months from the date of this recommendation.

This is to allow the applicant time to submit further information to enable National Highways to determine whether the proposals will create an unacceptable or severe impact on the SRN in line with the requirements of DfT Circular 01/2022 and the NPPF.

Standing advice to the local planning authority

The Climate Change Committee's [2022 Report to Parliament](#) notes that for the UK to achieve net zero carbon status by 2050, action is needed to support a modal shift away from car travel. The NPPF supports this position, with paragraphs 77 and 110 prescribing that significant development should offer a genuine choice of transport modes, while paragraphs 109 and 115 advise that appropriate opportunities to promote walking, cycling and public transport should be taken up as part of a vision-led approach.

Moreover, the carbon reduction hierarchy (avoid-switch-improve) as set out in clause 4.3 of PAS2080:2023 promotes approaches and measures to minimise resource consumption and thereby reduce carbon emissions.

These considerations should be weighed alongside any relevant Local Plan policies to ensure that planning decisions are in line with the necessary transition to net zero carbon.