



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 forms 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: 26 November 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

Background

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 westbound off-slip immediately to the north of the site.

National Highways provided an initial 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 27 May 2025. Our updated recommendation below should therefore be read in conjunction with our previous comments.

Policy Context

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. Subject to being otherwise acceptable with regards to safety, congestion and asset impacts, National Highways policy as set out within DfT Circular 01/2022 is to be supportive of proposals that increase and improve facilities for both freight and EV charging, which the proposed development will deliver.

In particular, paragraph 46 of the Circular sets out that government policies within the Future of Freight Plan, 'Planning reforms for lorry parking' Written Ministerial Statement (8 November 2021) and the NPPF state that consideration should be given as part of emerging development to ensuring that sufficient provision is made for HGV drivers to include overnight parking and welfare facilities, and paragraphs 79-82

support our approach to considering favourably proposals which increase roadside facilities for HGV drivers and the freight sector. It is noted that a number of distribution and warehousing developments have come forward along the M4 and A419 corridors increasing potential demand for freight facilities.

DfT Circular 01/2022 sets out the minimum standards and requirements for Motorway Rest Areas, particularly with regards to the provision of signing from the SRN. The applicant has sought to provide facilities that comply with these requirements. However, it should be noted that signing from the M4 will be subject to a separate application process directly to National Highways as the strategic highway authority.

Assessment of Traffic Impact and Mitigation

The proposed development has been assessed in a Vissim microsimulation model previously developed on behalf of National Highways. The model covers M4 J16 and the neighbouring junction of the A3102 Great Western Way with Lydiard Fields and Frankland Road. The model represents a 2023 base year, drawing on traffic survey data collected in July 2023 and covers assessment periods of 7.15-9.15am and 4.15-6.15pm.

On behalf of the applicant, Eddisons have used the model to assess the impact of diverted traffic passing through M4 J16 to access the proposed MRA. Various modifications to the model have been agreed between Eddisons and National Highways, including the minor modification of junction intergreens to reflect forthcoming changes.

Traffic demand has been estimated on the basis of available data for the nearby Membury and Leigh Delamere online Motorway Service Areas. The approach adopts average arrival and departure trip rates across the two service areas for the identified M4 J16 peak hours of 7:30-8.30am and 4.30-5.30pm. The resultant trip generation figures applied by Eddisons are summarised in Table 1 below, with the proposed development forecast to attract 502 two-way vehicles trips in the AM peak hour and 660 two-way trips in the PM peak hour. Peak hour traffic demand has then been extended across the wider model periods.

Table 1 – Adopted MRA Trip Generation

Time Period	Arrivals			Departures		
	Cars	HGVs	Total	Cars	HGVs	Total
AM Peak (7.30-8.30am)	191	60	251	191	60	251
PM Peak (4.30-5.30pm)	251	79	330	251	79	330

The vast majority of vehicular trips generated by the proposed development would divert from the M4 mainline to access and egress the site, with a small allowance (7%) made for local vehicular trips to/from Royal Wootton Bassett, Wroughton and Swindon.

During early assessment work Eddisons identified that a mitigation scheme would be required to address significant adverse impacts on the performance of the M4 westbound off-slip. Eddisons therefore propose that the westbound off-slip will be widened to provide an additional lane marked for onward travel to the MRA and B4005, with yellow-box markings also introduced at the junction with the roundabout circulatory. Assessments have also assumed a change in lane designation on the M4 eastbound off-slip with lane 3 of the slip road remarked for the B4005 only.

With Wiltshire Council's new Local Plan currently under Examination, along with extant consent or live applications for nearby development, Eddisons have assessed the following scenarios to meet National Highways requirements for cumulative assessment:

- Opening Year (2027) Reference Case scenario - accounting for remaining development at the nearby Wichelstowe new community and a live application (PL/2023/02129) for 410 dwellings in Royal Wootton Bassett.
- Opening Year (2027) Development Scenario - as per the Reference Case but with the addition of MRA traffic, proposed site access junction and mitigation.
- Forecast Year (2038) Reference Case - accounting for Wichelstowe and projected growth in traffic based on Wiltshire Council's strategic modelling for the Local Plan, along with localised widening of the A3102 northbound approach to the junction and associated lane allocation changes as proposed by Wiltshire Council to support delivery of the Local Plan.
- Forecast Year (2038) Development Scenario - as per the Reference Case but with the addition of MRA traffic, proposed site access junction and mitigation.

Forecast traffic associated with remaining development at Wichelstowe is based on figures agreed between Wiltshire Council and National Highways as part of Local Plan assessment work. The Local Plan assessment work has been separately reported by Wiltshire Council and will inform our representations to the Examination process.

In addition to the scenarios outlined above, Eddisons also undertook initial assessment work to account for a live planning application (PL/2025/00700) for a new BMW/ Mini car dealership located to the immediate west of M4 J16. The site would be accessed via a new signalised junction incorporating the existing access to the North Wiltshire Crematorium. The assessment work has provided confidence that the combined proposals can be accommodated but further refinement of the car dealership access junction is proposed to minimise the risk of queueing interaction with M4 J16. This work is progressing in liaison with consultants acting on behalf of the car dealership application, and the findings will inform National Highways response to that particular application.

The Eddisons modelling work has been reviewed on behalf of National Highways. The proposed mitigation is effective at limiting queues on the westbound off-slip and the eastbound off-slip is shown to operate without significant queueing. Whilst long queues are forecast to occur on the local road approaches to M4 J16 and the MRA site access roundabout, the motorway slip roads and circulatory are shown to accommodate projected traffic demands in the 2038 forecast year.

Following the conclusion of traffic modelling work, Eddisons submitted a Transport Assessment Addendum dated November 2025. Whilst a Forecasting Report is appended to the Addendum, it should be noted that the reported model results do not align with those previously reviewed by National Highways. Eddisons have since advised that the results presented in the November 2025 Forecasting Report are incorrect. An updated Forecasting Report was sent direct to National Highways and the results now align with our previous model review. We have shared the corrected results with Wiltshire Council and recommend that these are uploaded to the planning portal as relevant application material.

Appendix 10 of the Transport Assessment Addendum presents analysis of merge and diverge layout requirements according to the Design Manual for Roads and Bridges (DMRB). The analysis does not appear to have been updated from that included in the original Transport Assessment dated October 2023. Nevertheless, National Highways have reviewed available traffic flow information against recommended merge and diverge layouts in CD122 (Geometric design of grade separated junctions) of the DMRB. The analysis suggests that the existing merge and diverge layouts will remain adequate to accommodate the proposed MRA development.

In summary, the modelling provided is now accepted and has identified that a scheme of works is necessary at the M4 J16 to mitigate what would otherwise be an unacceptable/severe highways impact in accordance with the NPPF. An acceptable preliminary scheme of works for the westbound off-slip has been submitted as set out within *Proposed M4 Westbound Off-slip Improvement Scheme, drawing number 3728-F13 Rev H*, prepared by Eddisons and dated July 2025. The scheme has been subject to the required DMRB design compliance review, stage 1 Road Safety Audit process (RSA1) and WCHAR exemption in accordance with DfT Circular 01/2022. Modelling of the cumulative impact of the development, and the RSA1 report, has identified that a requirement for signing alterations (including lane allocations) will also be required at M4 J16 eastbound off-slip. These additional works will be addressed by the applicant through the detailed design process for the scheme, as agreed within the RSA1 designers response (problems 4 and 5 responses), which will be secured via the s278 legal agreement with National Highways which the applicant will be required to enter into to enable the implementation of the scheme. As the existing traffic signals at M4 J16 operate under MOVA (Microprocessor Optimised Vehicle Actuation) control, the existing installation will require review on account of and as part of the proposed mitigation package. A MOVA re-validation exercise should also be undertaken upon completion of the physical works, to ensure the performance of the junction signals is fully optimised to reflect the implemented improvements. We therefore consider that our concerns with regards the traffic impact of the development on the SRN have been satisfactorily addressed. National Highways is therefore recommending a planning condition to secure delivery of the highways mitigation scheme prior to the development being brought into use, with an associated informative which should be appended to any approval the planning authority is minded to grant.

The development will also require an access roundabout junction and associated works on the B4005 which is wholly within the local highway network. We will therefore expect Wiltshire Council as the relevant local highway authority to require delivery of the access junction as an early phase of the development.

Car parking requirements

Minimum parking requirements for an MRA are defined in DfT Circular 01/2022. The requirements are based on daily traffic flows passing the site. The applicant has reviewed WebTRIS data for the M4 mainline for the 12-month period of 2022. The review identified August as the busiest month, with a total 2-way average Annual Daily Traffic of 89,003 vehicles on the mainline (78,555 light vehicles and 10,448 HGVs). To future-proof car parking provision, the applicant has sought to account for growth in traffic over a 10-year period to 2033. The applicant's analysis indicates that the proposed level of parking provision is in line with or in excess of the minimum requirements contained within DfT Circular 01/2022.

Whilst the Circular does not contain minimum requirements for EV charging facilities, the development proposes the provision of 50 electric vehicle charging spaces from the commencement of development. There is the potential to increase this provision in the future, including EV charging spaces for HGVs, subject to demand and grid capacity.

Assessment of operational impacts

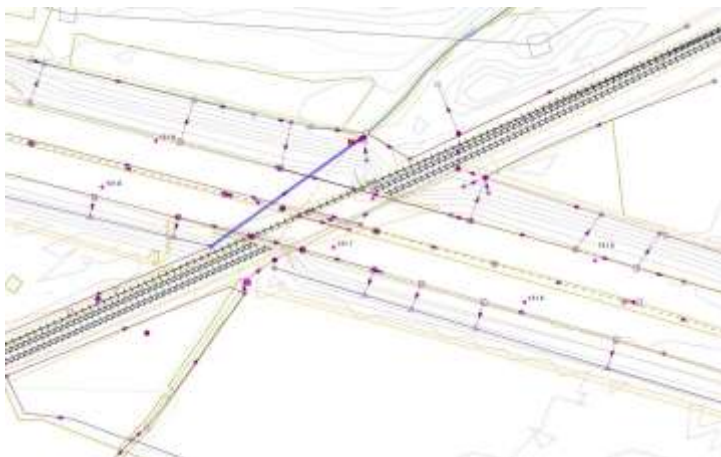
Due to the proximity of the development to the M4 westbound off-slip, the development has the potential to impact on operational strategic highway assets. We therefore need to be satisfied that the requirements of DfT Circular 01/2022 will be met.

Drainage

We have reviewed the applicant's updated Flood Risk Assessment and Drainage Strategy report which includes the greenfield surface water run-off calculation, hydraulic modelling up to and including the 1 in 100-year storm event plus 40% increase for climate change, outline surface water drainage layout plan, maintenance schedule and flood exceedance plan. It is noted that the hydraulic modelling for a 1 in 100-year storm event plus 40% increase for climate change indicates that the developments proposed surface water layout floods during various storm durations, which could impact the downstream land drainage system and National Highways M4 culvert.

We would therefore expect the applicant to review their hydraulic modelling as part of a detailed drainage design which we are recommending should be submitted for our review and acceptance in respect of the SRN prior to commencement of development.

It is also noted that the proposal to install a new roundabout on the B4005 will impact the existing surface water drainage between the M4 J16 Spittleborough Roundabout and Hay Lane, to which National Highways currently has a lease title. This is indicated within the Conceptual Surface Water Drainage Strategy drawing 107846-PEF-ZZ-XX-DR-CD-0504. Any changes to the B4005 surface water drainage may have an impact on National Highways downstream M4 1200Ø Culvert at MP131.7+50m as indicated from our asset records below.



This will therefore need to be evidenced and addressed as part of the detailed drainage design for the development and associated access proposals. However, we

consider that this matter can likewise be addressed by a suitable pre-commencement planning condition to secure the submission of a detailed drainage design for our review and acceptance in respect of the SRN impacts.

Similarly, the proposed mitigation scheme on the M4 westbound off-slip will also impact on existing drainage assets which will need to be accommodated to DMRB standards through the s278 and associated scheme detailed design process.

Boundary treatments, landscaping and screening

The topography and existing vegetation around the development site provides for open views across the site from the M4 carriageway, the westbound off-slip and junction circulatory lanes. 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 and this will need to be addressed. An HGV Headlight Spill Plan has subsequently been provided which proposes a 2m close boarded fence along the motorway boundary.

The Planning Statement in paragraph 3.17 also advises that “The fuel filling station shop is to benefit from a green roof as well as 14 solar panels on the canopy roofing.” We will therefore require a Glint and Glare Survey to be submitted for our review. Any mitigation identified as necessary must be incorporated into the proposals to ensure no adverse impact to users of the M4 and associated slip roads.

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 with 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.

It will therefore be necessary for the applicant to submit a detailed Boundary Treatment and Landscape Plan for our review and acceptance insofar as any potential impacts on the SRN. This will need to be accompanied by an associated Planting Schedule and maintenance strategy.

The developer should be advised that the following species must not be planted within 10m of National Highways estate:

1. Blackthorn (*Prunus spinosa*)
2. Goat willow (*Salix caprea*)
3. Crack willow (*Salix fragilis*)
4. Dogwood (*Cornus sanguinea*)
5. Italian alder (*Alnus cordata*)
6. Bird cherry (*Prunus avium*)

7. Quaking Aspen (*Populus tremula*)
8. Wild Privet (*Ligustrum vulgare*).

In addition, the following trees must not be planted in a position where at maturity they would be within falling distance of the carriageway or any significant National Highways asset:

9. Silver Birch (*Betula pendula*, *Betula pubescens*)
10. Austrian Pine (*Pinus nigra*)
11. Poplar (*Populus* sp)
12. English Oak (*Quercus robur*, *Quercus petraea*)

Furthermore, the planting of ash (*Fraxinus excelsior*) and larch (*Larix* sp) is ill advised due to the current diseases they spread and succumb to.

However, we consider that these matters could be addressed by pre-commencement planning condition.

In terms of National Highways existing soft estate, it is noted that there is no construction proposed within the north-east area where there are some trees within National Highways estate that are close to the red line boundary of the application site. In the field where construction is taking place, 'Tree Protection Fencing' is to be provided which should protect any trees that may be within our estate. However, the applicant should note that National Highways will not permit the removal of any trees or vegetation from our estate to facilitate the visibility of advertising.

DfT Circular 01/2022 Policy and Access

DfT Circular 01/2022 sets out our requirements with regards to access in respect of roadside facilities. In particular, paragraph 91 states that *"there must be no route through a roadside facility or its access link between the local road network and the SRN. In addition, any subsidiary accesses must be restricted to staff, deliveries, parties carrying out duties for and on behalf of the Secretary of State, the company, the emergency services, and breakdown recovery and assistance."* Paragraph 92 further states that *"access to other developments through a roadside facility or from its connection to the SRN is not permitted. Furthermore, where a new connection is agreed for a proposed roadside facility, the company will expect any subsequent change in the permitted land use to be in accordance with paragraph 22 of this circular."* Paragraph 22 sets out the expectation that planning authorities should restrict any change in the permitted land use of the associated development unless otherwise agreed by the strategic highway authority and that further through access to other developments should similarly be restricted.

It is noted from the submitted plans that the proposed roundabout junction removes an existing field access which will be replaced by an arm from the roundabout separate to the arm providing access to the development. This additional arm will serve the field to the south-east of the development only. This field is outside of the application red line boundary. It is acknowledged that an alternative access to the adjacent land will need to be provided by the development and on the understanding that this additional spur provides access to the agricultural field only, the requirements of the Circular would be met.

The proposed application site layout also proposes an informal route between the HGV parking area and the plot of land to the east which is within the application red line and intended to provide biodiversity enhancements. We consider this connection would also be compliant with the Circular on the understanding that the land the connection serves remains part of the development. National Highways is therefore recommending a planning condition to ensure that the field remains for biodiversity purposes ancillary to the MRA only and for no other use. No onward connection to any other land will be permitted.

Summary

National Highways has no objection to the proposed development, subject to planning conditions and the delivery of mitigation identified as necessary to address an otherwise unacceptable impact on M4 J16. We are also satisfied that, with the identified mitigation, the cumulative impact of the development with local growth proposed within the emerging Wiltshire Local Plan should not result in an unacceptable or severe impact on the SRN, in accordance with the NPPF and DfT Circular 01/2022.

Recommendation

National Highways recommends that conditions should be attached to any permission Wiltshire Council is minded to grant in respect of application reference PL/2023/09142 to the effect that:

1. No part of the Motorway Rest Area shall be brought into use unless and until the scheme of works for the improvement of M4 Junction 16 is completed and available for use. The works shall be implemented generally in accordance with the preliminary design drawing *Proposed M4 Westbound Off-slip Junction Improvement, drawing number 3728-F13 Rev H*, prepared by Eddisons and dated July 2025, subject to any necessary changes identified during the detailed design and Road Safety Audit process (including supplementary works to M4 Junction 16 eastbound off-slip signing and MOVA re-validation) unless otherwise agreed in writing by the local planning authority (in consultation with the strategic highway authority).

Reason: in the interest of the safe and efficient operation of the M4 motorway and to ensure the development traffic impact on the SRN is satisfactorily mitigated in accordance with DfT Circular 01/2022 and the NPPF.

2. The Motorway Rest Area shall be for the purpose of providing roadside facilities only and shall be for no other use.

Reason: in the interest of the safe and efficient operation of the M4 motorway in accordance with the requirements of DfT Circular 01/2022.

3. No through access between the Motorway Rest Area and any other development shall be permitted, and the undeveloped land forming the eastern extent of the Motorway Rest Area shall remain for biodiversity purposes ancillary to the Motorway Rest Area only and for no other use.

Reason: in the interest of the safe and efficient operation of the M4 motorway in accordance with the requirements of DfT Circular 01/2022

4. Prior to the commencement of development, a detailed design for the treatment of surface water drainage shall be submitted to and approved in writing by the local planning authority (in consultation with the strategic highway authority). No surface water shall be permitted to run off from the development on to the strategic road network or into any drainage system connected to the strategic road network. No drainage connections from any part of the development shall be made to any strategic road network drainage systems. Surface water drainage measures shall be implemented in accordance with the agreed design prior to the development being brought into use and maintained as such thereafter.

Reason: in the interest of the safe and efficient operation of the M4 motorway and to protect the highways drainage asset in accordance with DfT Circular 01/2022.

5. Prior to the commencement of development, a boundary treatment and landscaping plan in respect of the strategic highway boundary shall be submitted to and approved in writing by the local planning authority (in consultation with the strategic highway authority). The plan shall include as a minimum:
 - a) details of screening/fencing type, location, construction method and maintenance schedule;
 - b) details for management of existing boundary planting to include an Arboricultural Tree Survey and Tree Protection Plan with a method statement for any works required to address the removal, retention and management of trees along this boundary;
 - c) details of all proposed new planting including location, species mix, maintenance method statement and schedule;
 - d) details of any other screening feature, location, construction method and maintenance schedule.
 - e) cross-sections to demonstrate provision of a suitable maintenance strip.

All works shall be implemented in accordance with the agreed plan prior to the development being brought into use and maintained as such thereafter.

Reason: in the interest of the safe and efficient operation of the M4 motorway and to protect the integrity of the strategic highway asset in accordance with DfT Circular 01/2022.

6. No solar PV panels shall be installed unless and until a Glint and Glare Assessment has been submitted to and approved in writing by the local planning authority (in consultation with the strategic highway authority). All required screening measures shall be implemented in full prior to completion of the development such that there shall be no glint or glare impact on the surrounding highway network including the M4 motorway and Junction 16. All necessary screening shall be maintained as such for the duration of use.

Reason: In the interest of the safe and efficient operation of the strategic road network and to protect the safety of M4 motorway users in accordance with DfT Circular 01/2022.

7. External lighting shall be designed, installed and operated to be in a downward facing position at all times to minimise light spill onto the strategic road network, and maintained as such thereafter.

Reason: in the interest of the safe and efficient operation of the M4 motorway in accordance with DfT Circular 01/2022 and to mitigate any adverse impact from the development on M4 motorway safety.

Informative

The highways schemes associated with this consent involves works within the public highway, which is land over which the applicant has no control. National Highways will therefore require the applicant to enter into a suitable legal agreement to cover the detailed design and construction of the works. Please contact ThirdpartyworksSWarea@nationalhighways.co.uk at an early stage to discuss the details of the highways agreement and funding arrangements.

Commencement of works will also need to be timed to fit in with other road works on the strategic road network or local road network to ensure there are no unacceptable impacts on congestion and road safety. If the scheme requires traffic orders these will be subject to a minimum 12 week process.

Please be advised that National Highways may charge Commuted Sums for maintenance of schemes delivered by third parties. These will be calculated in line with HM Treasury Green Book rules and will be based on a 60 year infrastructure design life period

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.