

REPORT FOR STRATEGIC PLANNING COMMITTEE

Date of Meeting	10 th February 2026
Application Number	PL/2023/09142
Site Address	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.
Applicant	Moto Hospitality Ltd
Town/Parish Council	Lydiard Tregoze Parish Council
Electoral Division	Royal Wootton Bassett East ED – Cllr Andrew Matthews
Type of application	OUTLINE PLANNING PERMISSION: SOME MATTERS RESERVED
Case Officer	Gen Collins
Recommendation	That Outline Permission be GRANTED

Reason for the application being considered by Committee: The development is a major development located on the boundary with Swindon and has wider strategic implications, raising issues of more than local importance. It is recommended for approval. Consequently Part 3 of the Wiltshire Council Constitution requires this application to be decided formally by the Strategic Planning Committee.

It is important to note that the previous local ward member Cllr Steve Bucknell originally requested that this application be referred to Committee should officers be minded to recommend refusal of the application. This call-in was undertaken on the basis that he and the local Parish Council (Lydiard Tregoze) could see the need for this development; and the need being so great that it could outweigh policy reasons for refusal.

Following local elections, Cllr Andrew Matthews took over the seat and has retained this call-in on the same basis i.e. that he too sees a great need for the development.

1. RECOMMENDATION: For the reasons set out within this report, officers recommend that members of the Planning Committee endorse the officer recommendation to approve the abovementioned application, subject to a Section 106 (s106) legal agreement and planning conditions (as set out within sections 10 and 11 of this report).

2. Purpose of Report: The purpose of this report is to assess the merits of the proposal against the policies of the development plan and other material considerations and to consider the recommendation that the application should be approved subject to conditions and require the applicant to enter into a s106 legal agreement.

3. Report Summary: This report appraises the: principle of the development; loss of agricultural land; visual/landscape impacts; highway safety; flood risk and drainage; heritage impacts; neighbouring amenity (including the rights and amenity of the occupiers of the adjacent Gypsy Traveller site) and amenity of future users; ecology; planning obligations.

This application was screened for Environmental Impact Assessment in 2023. At the time officers considered that it would not be EIA development. Subsequently the applicant applied for planning permission and submitted an Environmental Statement in any event. Accordingly, in line with current guidance, this application has been treated as EIA development in accordance with requirements of the Environmental Regulations. Due regard has been had in the following assessment to the likely significant environmental effects and impact of the development on likely environmental receptors.

The application has support from Lydiard Tregoze Parish Council within whose area it sits as well as support from the neighbouring Town and Parish Councils (RWB TC and Wroughton PC, Chiseldon PC, Hayden Wick Parish Council (Swindon)) subject to highway safety being assured and there being no concerns regarding the cumulative impact on the highway network. The details of these representations are provided within section 8 of this report.

62 representations (some multiple from the same party) have been received. Of these, 4 representations from 4 people support the application and 58 representations from 38 people (including CPRE) object to the development.

4. Site Description: The application Site comprises 7.28 ha of agricultural land. The Site is located immediately adjacent to the east of Junction 16 (J16) of the M4 motorway. The B4005 (Hay Lane) runs along the western and southern boundaries and the M4 runs along the northern boundary. The site is located approximately 1km to the southwest of the settlement of Freshbrook and 5km to the city centre of Swindon. The Proposed Development is an irregularly shaped area consisting of predominantly greenfield land in agricultural use with internal boundaries comprised by scattered trees and broken hedges. The topography undulates slightly with land dropping towards the southeast and rising towards the northwest of the site.

Land to the north of the site comprises urban built form and includes a variety of uses, the nearest of these including car dealerships, Holiday Inn Express (hotel) and industrial warehouses. Beyond these developments to the north is an established residential area of Freshbrook. To the east of the site are agricultural fields with internal boundaries delineated by hedgerows and trees. The eastern side of which (within the administrative boundary of Swindon) is an established Gypsy & Traveller site accessed off Hay Lane (the B4005), approximately 236m from the site boundary's nearest point separated by an agricultural field and mature vegetation. Junction 16 of the M4 is located immediately to the northwest of the site. To the west of the site are further fields, parcels of woodland and a solar farm. To the south the land is predominantly open countryside with a Butterfly World and Farm Park approximately 450m to the southeast of the site.

A small area in the south-west corner of the Site has previously been used as a depot for the recent improvements to Junction 16. However, the land has since been restored and surfacing removed from the site.

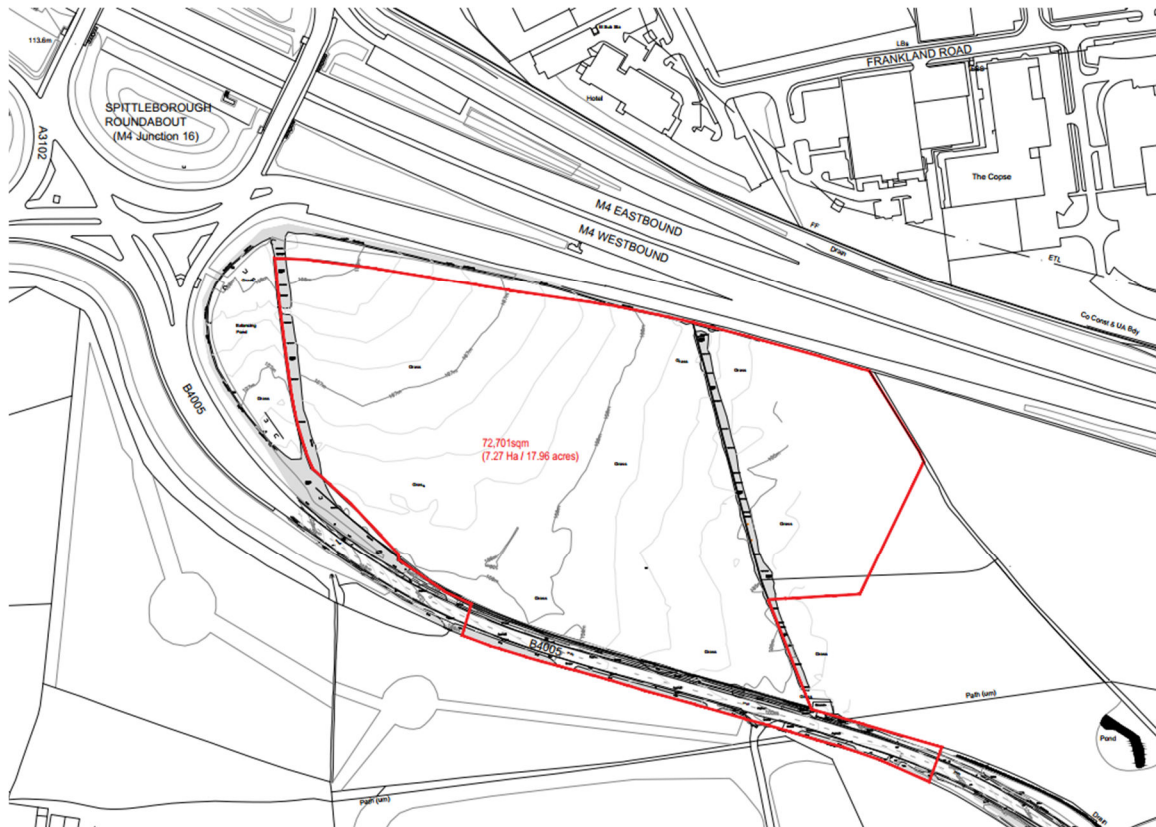


Figure 1: The site location plan



Figure 2: Aerial Image of the site taken from Google maps

The Site is not allocated for development in the Wiltshire Core Strategy (adopted 2015) and is located outside of any defined settlement limits.

The site is located 230m from the boundary with Swindon. The boundary is indicated by the thick black line on the extract below with Wiltshire to the west and Swindon to the east:

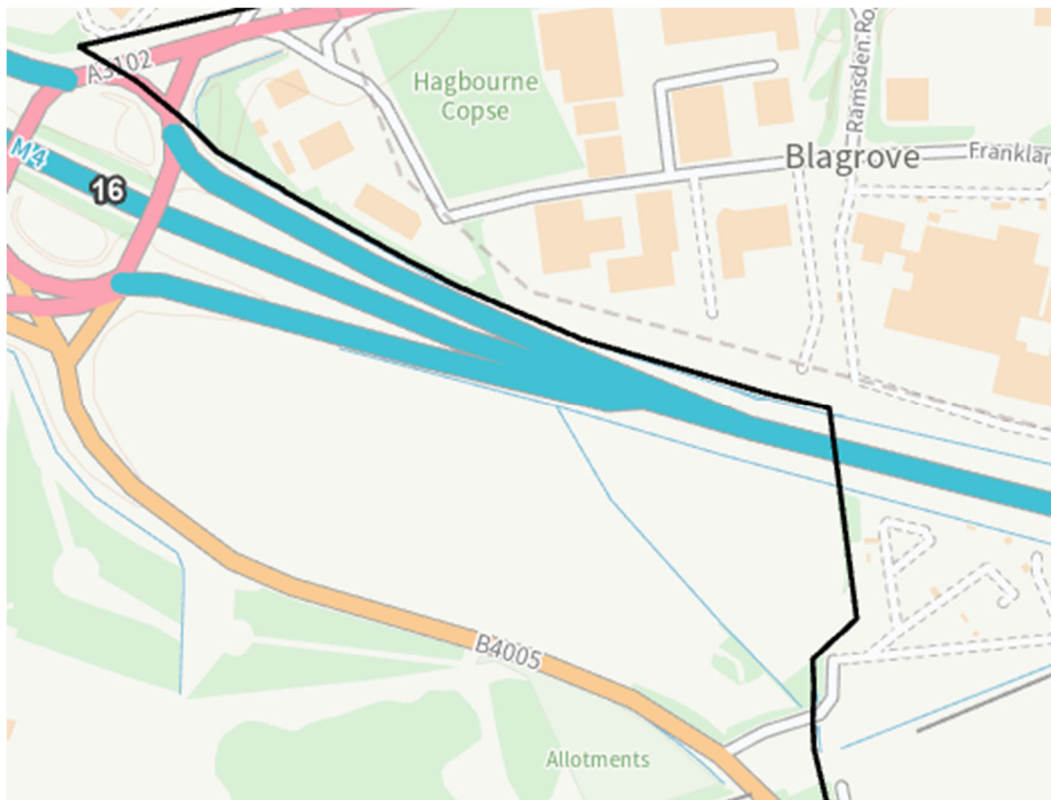


Figure 3: Extract from the Council's planning policies mapping showing boundary with Swindon

There are no designated heritage assets on site. The nearest conservation area is Royal Wootton Bassett Conservation Area, approximately 3.5 km away. The nearest listed building is Upper Studley Farm (Grade II) located 311m to the southwest.

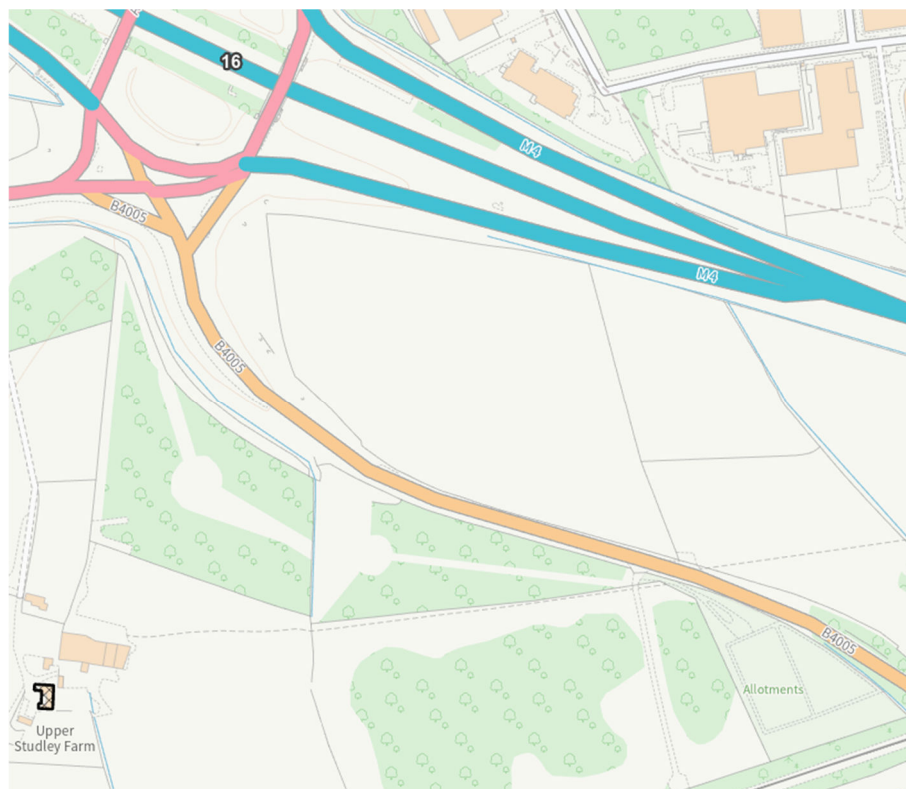


Figure 4: Extract from planning policy map showing Grade II listed Upper Studley Farm

Geophysical surveys and trial trenching evaluation of the site have confirmed there is no archaeological potential on the site.

The site lies within a Mineral Safeguarding Area. The area has been safeguarded due to the presence of clay associated with the Kimmeridge Clay Formation and the underlying Ampthill Clay Formation.

There are no specific landscape designations for the site. It is located in the Upper Thames Clay Vales Countryside Character Area and within the Calne and Hilmarton Rolling Lowland Landscape Character Assessment Area. The edge of the North Wessex Downs National Landscape is located some 2.5km to the southeast. There are Group Tree Preservation Orders indicated on the site on the planning policy maps (N/TPO51) (shown hatched green in the extract from the planning policies map below):



Figure 5: Group Tree Preservation Orders on the site taken from the planning policies map

With groups G22, G23, and G24 under TPO51 working from left to right. This is an elderly TPO and within G22 and G23 there are no TPO'd trees left having been removed previously due to Futch Elm disease. G24 has an Oak tree but this is not within the site, being further east on the eastern field boundary outside the site.

There are no specific ecological designations on the site and there are no site-specific biodiversity sensitivities.

The eastern edge of the site clips the edge of an Esso pipeline easement corridor (shown in red below) but the Esso pipeline itself (shown in blue) is not within the site. The green washover indicates that it is within Thames Water Utility Area:

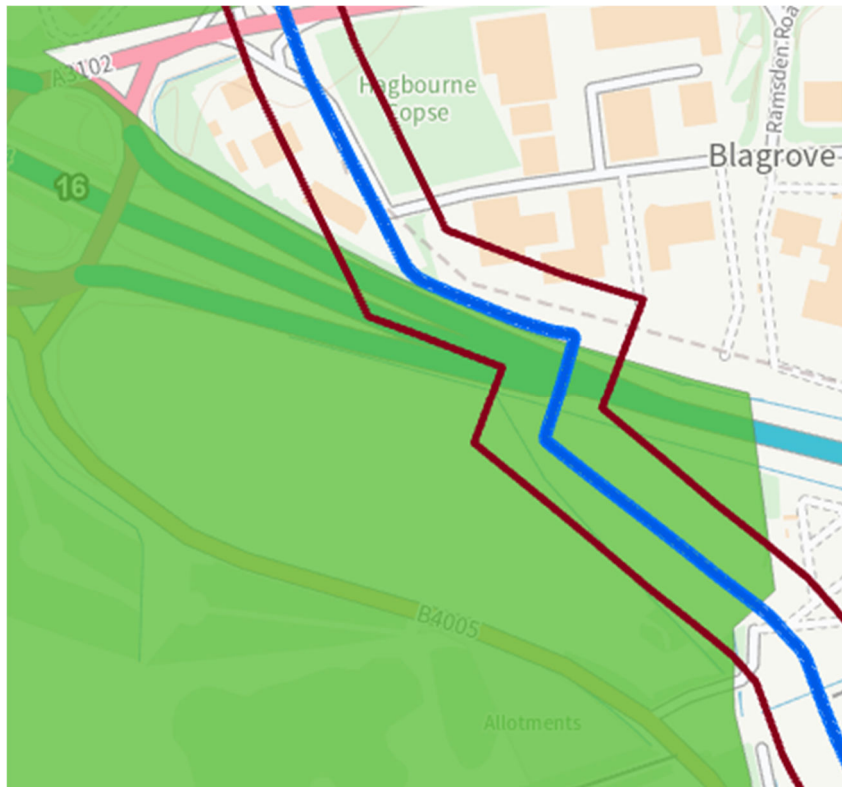


Figure 6: Extract from planning policies map showing utilities on site

A Public Right of Way (LTRE6 shown in purple below) meets the southeast corner of the site at the B4005 but is not within the site.



Figure 7: extract from planning policies mapping showing PRoW LTRE6 in purple

The site is located wholly within floodzone 1 with the lowest risk of fluvial flooding. A culverted watercourse runs along the eastern side of the site, outside the site, on a north to southeast axis. The most recent EA flood risk mapping within the Council's Strategic Flood Risk Assessment indicates that

there is no evidence of groundwater flooding on site and a low risk of limited surface water flooding:



Figure 8: extract from the Council's SFRA showing likely surface water flooding risk for 1 in 100 years events

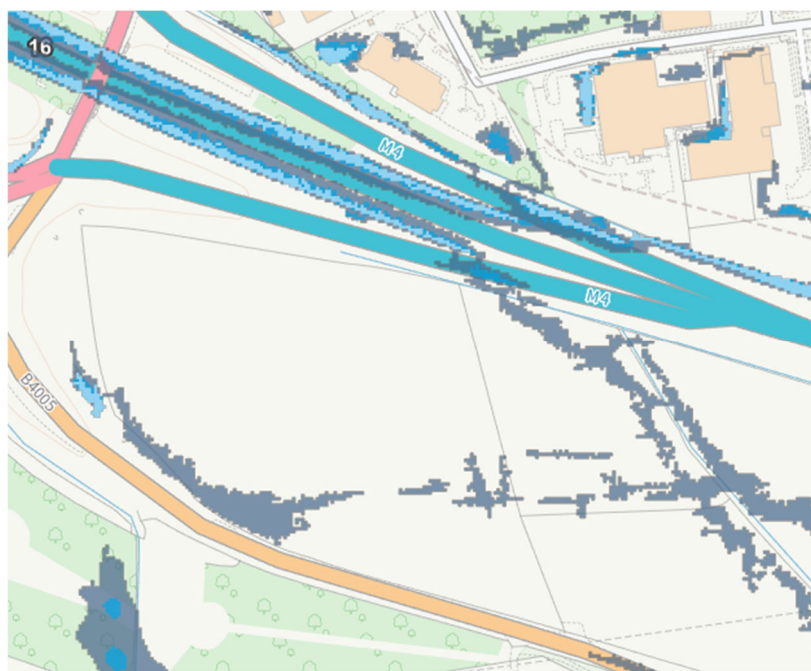


Figure 9: extract from the Council's SFRA showing likely surface water flooding risk for 1 in 100 years events

With reference to the government's online Magic Map¹ mapping tool, the site is located on land designated as Grade 3B (depicted by the light green colouring) shown on the extract below:



Figure 10: Extract from Magic map showing site Grade 3b ALC

Based on the Magic Mapping resource, the application site does not include land which the NPPF defines as ‘best and most versatile agricultural land’ (BMV).

5. Planning History: There is no recent planning history on the site relevant to this application. There is however an existing live application ref: PL/2025/00700 for the ‘erection of a car dealership (Sui Generis) and ancillary preparation centre; associated access, parking, landscaping, drainage and infrastructure’ on land the other side of J16. This live application is considered to be a material planning consideration and has been considered in the context of this application, specifically in terms of cumulative traffic impact on J16 and the local highway network. Details of this are set out in the Highways section below.

6. The Proposal: This application seeks outline planning permission for a new Motorway Rest Area (MRA) with all matters reserved and access to be determined. Access will be taken from the B4005. These works will involve the creation of a new access roundabout into the site which will also provide for continued farm access to the land to the east.

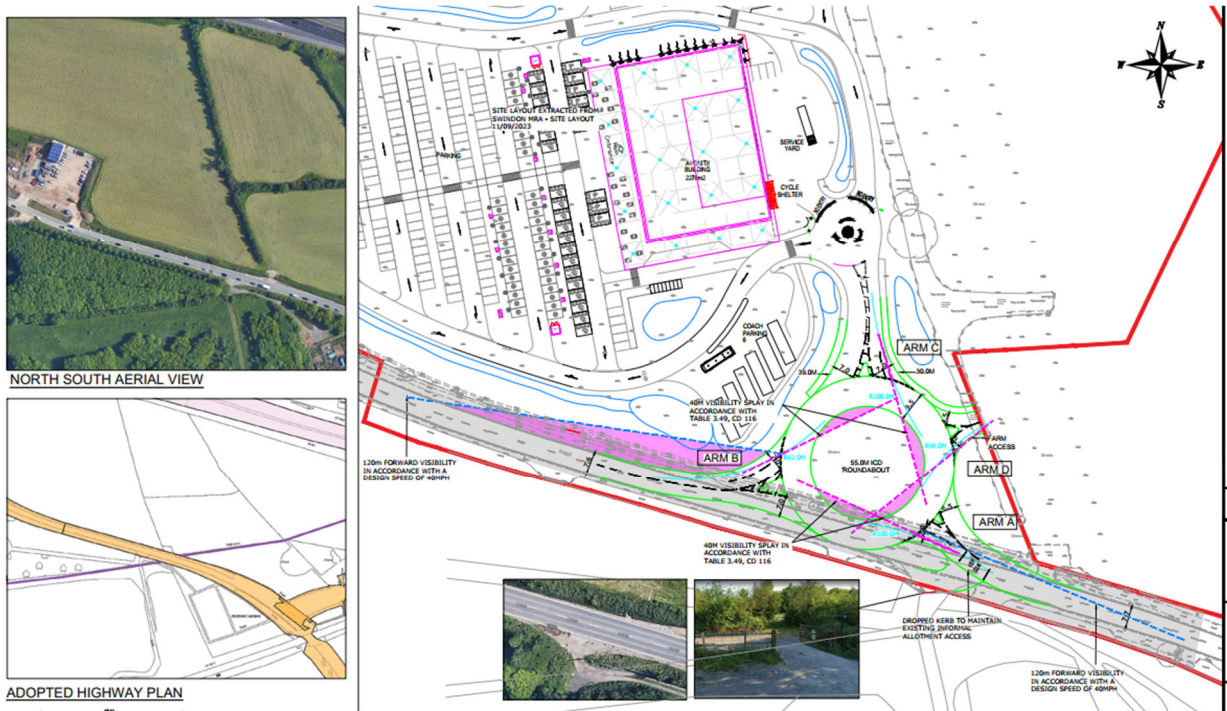


Figure 11: Proposed site access plan

Scale, Layout, Appearance and Landscaping are all to be left for the detailed design at reserved matters stage. A Proposed Layout Plan (illustrative) (ref. M49_101 Rev G) and Illustrative Masterplan (ref. M49_115 Rev A) have been submitted in support of the application (but are not formal application plans) and show how the development could be laid out, at the detailed design stage. An illustrative masterplan has been submitted for the application site shown below:



Figure 12: Proposed Illustrative Masterplan

The submitted plans show that a large part of the eastern area of the site has been reserved for onsite

biodiversity net gain. The proposal incorporates large ecological areas including drainage, green roofs, landscaping and boundary planting. The scheme will provide a significant quantity of proposed parking to the north (HGVs), the south (coaches) and the west (caravans and cars) including a large number of charging points comprising the provision detailed below:

- 241 no. Car Parking Spaces;
- 62 no. Heavy Goods Vehicle Parking Spaces;
- 1 no. Heavy Goods Vehicle Parking Space (Abnormal Load);
- 6 no. Coach Parking Spaces;
- 7 no. Caravan Spaces; and
- 12 no. Motorcycle Spaces.

The proposed development would be served by its own surface water & drainage strategy which is submitted for consideration. There is an indicative landscaping scheme also accompanying the application. This indicates the following would be provided:

- Woodland Planting
- Wildflower Meadows
- Wetland Meadow
- Native Scrub
- Ornamental Scrub
- Rain Garden

Alongside the provision of parking and landscaping arrangements, the proposals also include a 2,270 sqm amenity building to the center of the site that would be a maximum of 12m high with a green roof and will provide a range of facilities to meet the welfare needs of users of the Strategic Road Network (M4). The amenity building is intended to be built to a BREEAM excellent standard.

A fuel filling station will also be delivered as part of the proposals. This would be located to the north of the Site, along with sub stations to provide power to the proposed EV charging points. The fuel filling station shop is indicated to have a green roof as well as 14 solar panels on the canopy roofing.

A parameters plan showing the proposed access, different uses and landscaping on site is shown below:



Figure 13: Proposed Parameters Plan

INDICATIVE BUILDING FOOTPRINTS

POTENTIAL ACCESS FOR TRUCKS

FARM ACCESS ONLY

12000 HIGHWAY 101

N

12000 FORWARD VISIBILITY IN ACCORDANCE WITH A DESIGN SPEED OF 40KPH

The image below (taken from the Planning statement/DAS) is a CGI showing what the detailed design of the development could look like when completed:



11

Notwithstanding the above, as this application is outline with all matters except access from the B4005 reserved, any layout plans submitted as part of this application are indicative and for illustrative purposes only.

In summary, the proposed development will deliver:

- a 'Fit for the future' Motorway Rest Area including a purpose-built amenity building built to BREEAM Excellent standard;
- EV charging facilities, including 50 active EV charging points upon occupation;
- Create 63 HGV parking spaces and other associated facilities as well as 241 parking spaces and coach/motorcycle parking;
- a + 16.6% gain in biodiversity through the provision of new and enhanced wildlife habitat and an increase in hedgerow units by 13.3%
- Support the safety and welfare of users of the SRN through the provision of additional service facilities.

7. Planning Policy & Legislation

National Planning Policy, Guidance & Legislation:

- National Planning Policy Framework (NPPF)
- Planning Practice Guidance (PPG)
- National Design Guide
- Habitat Regulations
- Human Rights Act 1998
- Article 8 of the European Convention on Human Rights
- Equality Act 2010

Development Plan:

The development plan for Wiltshire comprises the Wiltshire Core Strategy (WCS) (which was adopted in January 2015), as well any made neighbourhood plans. Lydiard Tregoze has a Neighbourhood Area designation but no current made Neighbourhood Plan.

In line with Section 38(6) of the Planning and Compulsory Purchase Act 2004, planning decisions must be made in accordance with the development plan unless material considerations indicate otherwise. Though the development plan is considered as a whole, those parts deemed to be particularly relevant to this application are listed below:

The adopted *Wiltshire Core Strategy (WCS)*, with particular regard to:

- Core Policy 1 Settlement Strategy
- Core Policy 2 Delivery Strategy
- Core Policy 3 Infrastructure Requirements
- Core Policy 19 Royal Wootton Bassett and Cricklade Spatial Strategy
- Core Policy 41 Sustainable Construction and Low-Carbon Energy
- Core Policy 47 Meeting the Needs of Gypsies and Travellers
- Core Policy 48 Supporting Rural Life
- Core Policy 50 Biodiversity and Geodiversity
- Core Policy 51 Landscape
- Core Policy 52 Green Infrastructure
- Core Policy 55 Air Quality
- Core Policy 57 Ensuring High Quality Design and Place Shaping
- Core Policy 58 Ensuring the conservation of the historic environment
- Core Policy 60 Sustainable Transport
- Core Policy 61 Transport & Development

- Core Policy 62 Development Impacts on the Transport Network
- Core Policy 63 Transport Strategies
- Core Policy 64 Demand Management
- Core Policy 65 Movement of Goods
- Core Policy 66 Strategic Transport Network
- Core Policy 67 Flood Risk.
- Core Policy 68 Water Resources

North Wiltshire District Local Plan (saved policies)

- Policy H4: Residential Development in the Countryside
- Policy NE14: Trees, site features and the control of development
- Policy NE18 Noise and Pollution

Wiltshire and Swindon Mineral Core Strategy and Development Control Policies (2009)

- Policy MCS 6 'Safeguarding Mineral Resources, Rail-head Facilities and Mineral Recycling Facilities
- Policy MDC 4 'Safeguarding Mineral Resources, Rail-head Facilities and Mineral Recycling Facilities

Emerging Policy – Wiltshire Local Plan Review:

The Council's emerging Local Plan is a material consideration and is progressing through the examination hearings stage but at the time of determining this application, the emerging Plan, carries limited weight in recognition that the Council's proposed new strategy has not been fully examined. However, the following draft policies are of relevance.

- Policy 1: Settlement Strategy
- Policy 2: Delivery Strategy
- Policy 4: Addressing climate change
- Policy 5 Securing Infrastructure Provision from New Development
- Policies 44- 51: Swindon Area Strategy
- Policy 70: Sustainable Transport
- Policy 71: Transport And New Development
- Policy 73: Transport Demand Management
- Policy 74: Movement of Goods
- Policy 75: Strategic Transport Network
- Policy 90: Woodland, Hedgerows and Trees
- Policy 91: Conserve and Enhance Wiltshire's Landscape (replaces Core Policy 51)
- Policy 92: Conserving and Enhancing Dark Skies
- Policy 93: Green and Blue Infrastructure (replaces Core Policy 52)
- Policy 98: Ensuring High Quality Design and Place Shaping (replaces Core Policy 57)

The draft Wiltshire Council Gypsies and Travellers Development Plan Document pre-submission draft (Reg 19) August 2024

Other Relevant Policies and Supplementary Planning Documents:

- Wiltshire Infrastructure Delivery Plan 3 (2011-2026)
- Circular 01/2022: Strategic road network and the delivery of sustainable development
- Road Investment Strategy 2 2020-2025
- Draft Road Investment Strategy 3 2026-2031 (August 2025)
- Transport Decarbonisation Plan
- National Highways' Net Zero Plan
- South West Freight Strategy 2022
- Wiltshire Council Local Transport Plan 2011-2026 (LTP3)
- Wiltshire Council Local Transport Plan 2011-2026 (LTP3) Freight Strategy 2011
 - FP2: Freight routes To facilitate the efficient movement of freight traffic with the minimum social, environmental and economic costs.

- FP5: Lorry parking
- FP6: Lorry parking at new developments Ensure that any new industrial / commercial development which falls under the relevant criteria, initiates a transport statement / assessment to consider good quality HGV parking, services and manoeuvring space as an integral part of the proposed development.
- Wiltshire Council Local Transport Plan 2025-2038 (LTP4)
 - Policy S5: Encourage and enable shift to more sustainable modes for freight
 - Policy I1: Facilitate and encourage move to low and zero emission vehicles
 - Policy I2: Enable safer, more efficient driving and operation of road networks
- Wiltshire Council Local Transport Plan 2025-2038 (LTP4): Freight Sub Strategy March 2025
- Wiltshire Council Electric Vehicle Charging Infrastructure (EVCI) Plan 2021 to 2024
- Wiltshire Local Cycling and Walking Infrastructure Plan (LCWIP)
- Active travel infrastructure design standards 2022
- Active travel parking standards and design guide 2022
- LTN1/20 – Cycle Infrastructure Design (July 2020)
- Waste storage and collection: guidance for developers
- Wiltshire Design Guide (adopted April 2024)
- Wiltshire Council's Waste Core Strategy, adopted July 2009
- A Green & Blue Infrastructure Strategy for Wiltshire: Wiltshire's Natural Environment Plan 2022-2030
- Open Space provision in New Housing Developments – A Guide (Supplementary Planning Guidance) and Wiltshire Council's Playing Pitch Strategy February 2017
- Wiltshire Council's Playing Pitch Strategy December 2024
- Community Infrastructure Levy (CIL) Charging Schedule
- Wiltshire Climate Strategy (2022-2027)
- Great Western Community Forest Plan
- Wiltshire Council Landscape Character Assessment
- Government Planning Policy for Traveller Sites (December 2024)

8. Summary of Consultation Responses

Statutory and Internal Consultees:

Parish Councils

- Lydiard Tregoze Parish Council: Supports this application as a needed service for the community and Heavy Goods Vehicle (HGV) drivers on the M4.
- Royal Wootton Bassett Town Council: Support the application but raise concern regarding cumulative impact of future development on the road network including access to and the effect on Junction 16 of the M4.
- Wroughton Parish Council: No objection subject to following conditions:
 - Signage is crucial and MUST direct traffic leaving the MRA and which wishes to join the M4, to turn RIGHT out of the site to join the M4 at J16.
 - Traffic sensitivity test modelling to be carried out prior to building being started.
 - Biodiversity should be ringfenced with an obligation for the developer to maintain it for the first 30 years.
 - A footpath and a reasonable bus service to and from Wroughton are required.
- Chilsedon Parish Council: Support the application and support the representations made by Wroughton Parish Council in requiring appropriate signage from and to the MRA.

- Haydon Wick Parish Council (Swindon): Recognise the potential economic benefits but have concerns about the following impacts on the Parish:
 - Increased Congestion - The parish already suffers from congestion on local roads at peak times.
 - Any increase in traffic to/from the proposed MSA could make this much worse, whether from passenger cars, lorries, or delivery vehicles.
 - Heavy Goods Vehicles - Provision of HGV parking spaces will inevitably attract more lorries onto local roads to access the MSA. The impact on noise, air quality, pedestrian safety is unacceptable to our parish.
 - Road Safety - Increased traffic flows in the area heighten risks of accidents, whether from the access roads or drivers using the MSA. There are already too many accidents at this section of the M4.

The Parish requests that Wiltshire Council challenge the analysis and demand mitigation measures prior to any approval.

Ward Councillors

Cllr Steve Bucknell (prior to the May 2025 local elections) requested that this application be referred to Committee should officers be minded to recommend refusal of the application. This call-in was undertaken on the basis that he and the local Parish Council (Lydiard Tregoze) could see the need for this development; and the need being so great that it could outweigh policy reasons for refusal.

Cllr Andrew Matthews Following local elections, retained this call-in on the same basis i.e. that he too sees a great need for the development.

Statutory Consultees

Environment Agency: No objection subject to conditions.

Historic England: No objection.

National Grid: No objection.

National Highways: No objection subject to conditions.

Natural England: No objection.

Network Rail: No objection subject to informatives.

Swindon Borough Council Planning and Transport: No objection - defer to Wiltshire Council and at National Highways.

Thames Water: No objection subject to informative.

Internal Consultees

WC Economic Development: Support the application

WC Electric Vehicle Infrastructure Strategy Team: Support the application

WC Landscape Officer: No objection subject to condition and defers to National Highways with regard to landscaping detail adjacent to SRN / highway.

WC Climate Team: Support the application

WC Conservation: No Comment.

WC Archaeology: No objection.

WC Highways: No objection subject to conditions and s106.

WC Rights of Way: No objection.

Active Travel England: No comment received at time of writing.

LLFA: No objection subject to condition.

WC Waste & Recycling Team: no objection

WC Ecology: No objection subject to condition.

Dorset & Wiltshire Fire & Rescue: No objection.

WC Arboricultural Officer: No objection subject to condition.

WC Public Protection: No objection subject to conditions.

Third Party Representations

In accordance with the requirements of the Town and Country Planning (Development Management Procedure) (England) Order 2015 (as amended), the application was publicised by way of:

- Neighbour notification letters sent to adjoining and nearby properties;
- A site notice displayed near the site;
- An advertisement placed in the local press.

These methods were used to inform interested parties and provide a period of 21 days for comments to be submitted.

Below is a summary of the representations received during the consultation period. Only material planning considerations have been taken into account in the assessment of this application. Non-material issues, such as property values or private legal disputes, cannot be considered in the determination process.

North Wiltshire Swifts: All new developments should provide habitat opportunities for those species, such as swifts, who prefer/can adapt to the built environment. Recommend planning conditions requiring the construction of swift bricks.

Residents: A total of 62 representations (some multiple from the same party) have been received. Of these, 4 representations from 4 people support the application on the following grounds:

- Proposal beneficial for motorists on the M4 and local highways network
- Has the potential to improve layout, sustainability, and EV charging provision (solar canopy).
- Good design

58 representations from 38 people (including CPRE) object to the development on the following grounds:

- Highway Safety, Traffic Impact and Junction Capacity
 - Significant increase in traffic at M4 J16, A3102, B4005 and Hay Lane, leading to congestion, delays and potential gridlock at peak times.
 - Junction 16 already operating near or at capacity; recent improvements did not anticipate a motorway service area (MSA).
 - Concerns that the Traffic Assessment is out-of-date, incomplete, based on unrealistic

assumptions, or fails to account for cumulative growth (Wichelstowe, Royal Wootton Bassett, Lyneham, Purton, other local proposals).

- Lack of direct motorway access; all traffic must use local roads, contrary to Government preference for 'online' services.
 - Safety risks from additional HGVs, including slow acceleration through signal-controlled junctions, lane confusion, and increased collision risk.
 - Known accident history at J16, the A3102, and B4005/Brimble Hill, including fatal accidents and documented road width constraints.
 - Risk that additional traffic will divert onto rural lanes, exacerbating safety concerns for pedestrians, cyclists, equestrians and school routes.
 - Proposed roundabout and access arrangements on the B4005 considered to prejudice local traffic movement and safety.
 - Potential obstruction/emergency risk when traffic lights fail at J16, which has already resulted in incidents.
- Cumulative Development & Infrastructure Capacity
 - No holistic assessment of combined impacts from multiple committed or emerging developments.
 - Concerns that infrastructure capacity (highways, drainage, waste collection) is already strained and cannot accommodate additional demand.
 - Junction 16 cited in the emerging Local Plan as reaching capacity, favouring development at other junctions (e.g., J17).
 - Pollution and Environmental Impacts
 - Increased air pollution from HGVs and 24-hour vehicle movements.
 - Noise pollution affecting nearby residential areas, particularly night-time disturbance.
 - Light pollution in what is currently a rural and unlit landscape, affecting residential amenity, dark skies and protected species (e.g., bats).
 - Risk of waste-related impacts, including odour, vermin, and insufficient detail on waste storage/collection.
 - Potential pollution of waterways, ditches and local drainage network.
 - Landscape, Countryside & Biodiversity
 - Loss of greenfield land and erosion of the rural buffer between Swindon, Wroughton and Royal Wootton Bassett.
 - Adverse impact on local wildlife habitats (deer, badgers, bats).
 - Cumulative loss of farmland due to development pressure.
 - Concerns that proposals do not meet biodiversity protection requirements or respect rural character.
 - Gypsy & Traveller Community Impacts
 - Noise, light and traffic effects harming living conditions.
 - Proximity to what is viewed as an industrial-scale facility conflicting with national standards for Gypsy & Traveller sites.
 - Safety concerns accessing allotments opposite the site.
 - Potential equalities impacts due to a protected demographic group.
 - Alleged failure to notify and consult site residents during earlier stages of application.
 - Need / Justification
 - Presence of existing MSA facilities at Membury and Leigh Delamere within short travel distance; duplication of services available locally (fuel, EV charging, food).
 - Questioning the demonstrable need required by national policy for an 'offline' MSA.
 - Suggestion that upgrades to existing MSAs would be more appropriate and sustainable.
 - Impact on Residential Amenity
 - Deterioration of living conditions from 24-hour noise, lighting and activity.

- Anticipated reduction in property values (amenity-based concerns only).
- Concerns regarding antisocial behaviour associated with large car parks and fast-food outlets.
- Drainage, Flooding & Infrastructure
 - Site located in low-lying area with surface water flood risk; concerns that increased hardstanding will exacerbate drainage issues.
 - Queries regarding capacity of utilities infrastructure (e.g., National Grid).
- Impact on Local Economy
 - Threat to existing fuel/food service businesses at Lydiard Fields, Blagrove and Royal Wootton Bassett.
 - Proposal seen as inconsistent with Wiltshire's Green Economy Strategy and local employment objectives.
- Procedural & Consultation Concerns
 - Claims of incomplete or flawed public consultation, including missing site notices and lack of communication with adjacent residents.
 - Concerns that the application precedes relevant Neighbourhood Plan progression.
 - Queries about accuracy of officer statements regarding site context.

9. Planning Considerations and Assessment

Section 70(2) of the Town and Country Planning Act 1990 and section 38(6) of the Planning and Compulsory Purchase Act 2004 require that the determination of planning applications must be made in accordance with the Development Plan, unless material considerations indicate otherwise.

9.1 Principle of Development: The application site is located outside the defined limits of development and is not allocated in the WCS. The application is located in the open countryside. Wiltshire Core Strategy Policies CP1 (Settlement Strategy) and CP2 (Delivery Strategy) set out the spatial strategy for sustainable development across Wiltshire. These policies direct new development to the most sustainable locations. Development outside of these limits will not be permitted apart from the following exceptions:

- Additional employment land;
- Military establishments;
- Development related to tourism;
- Rural exception sites;
- Specialist accommodation provision; and
- Supporting rural life.

9.2 The applicant's Planning Statement suggests that this proposal represents a departure from the development plan however this is considered not to be the case in these circumstances.

Policy 48 of the WCS (Supporting Rural Life) is listed as an exception to policies CP1 and CP2 of the WCS at paragraph 4.25 of the WCS.

Core Policy 48 states that improving access to services and improving infrastructure is an important part of supporting rural life. It states that *"proposals which focus on improving accessibility between towns and villages ... such as transport and infrastructure improvements will be supported where the development will not be to the detriment of the local environment or local residents"*.

This application is for a new motorway rest area providing a rest stop for all users of the strategic road network and will provide much needed electrical vehicle charging infrastructure. This application therefore focuses on improving the accessibility between towns and villages not just in Wiltshire but across the neighbouring authorities.

Sections 9.14 and 9.15 below assesses this proposal in detail in terms of the impact on the local environment and on local residents. These assessments conclude that no significant material harm or detriment to the local environment or amenity of local residents and neighbouring occupiers will arise as a result of the proposal subject to conditions. Accordingly, this proposal meets requirements of Core Policy 48 of WCS.

Core Policy 65 of the WCS states that *“the council and its partners will seek to achieve a sustainable freight distribution system which makes the most efficient use of road... networks in particular ... (iii) overnight lorry parking should be provided in the vicinity of the advisory freight network ... where demand can be demonstrated...”*.

The Strategic Transport Network includes the national primary route network, and the strategic advisory freight route network includes the M4, as defined at paragraph 6.178 of the WCS.

The proposed development will contribute to achieving an improved sustainable freight distribution system making the most efficient use of existing road networks. The proposed overnight lorry parking is provided adjacent to the advisory freight network (the M4).

In terms of demonstrating the demand for this development a detailed assessment of the need for HGV parking and EV charging in this location is set out below in the following section 9.3. It is therefore considered that core policy 65 of the WCS is met in this case.

Core Policy 66 (Strategic Transport Network) confirms that *“work will be undertaken in conjunction with the Highways Agency (now National Highways) ... and other agencies ... to develop and improve the strategic transport network and support the objectives and policies in the Core strategy and Local Transport Plan”*.

Supporting text to Core Policy 66 confirms that the function of the strategic transport network is primarily to cater for the efficient movement of inter-urban and long-distance trips. In doing so the strategic transport network supports the vision and objectives of the Core Strategy. It is considered that this proposal through providing an additional modern fit for purpose motorway rest area including an electrical vehicle charging hub for all users of the strategic road network, supports the aims of Core Policy 66 of the WCS as well as helping to meet the overarching strategic objectives in the Core Strategy, and those set out in the Local Transport Plans as detailed below.

The Wiltshire Council Local Transport Plan 2011-2026 (LTP3) Freight Strategy 2011 contains policies seeking to facilitate the efficient movement of freight traffic with the minimum social, environmental and economic costs (Policy F2).

Policy FP6 seeks to ensure that any new industrial / commercial development which falls under the relevant criteria, initiates a transport statement / assessment to consider good quality HGV parking, services and manoeuvring space as an integral part of the proposed development.

Wiltshire Council Local Transport Plan 2025-2038 (LTP4) contains policies S6 and I2 that encourage and enable shifts to more sustainable modes for freight and to enable safer, more efficient driving and operation of road networks.

Wiltshire Council Freight Sub Strategy March 2025 and Local Transport Plan 2025-2038 (LTP4) March 2025 Policy I2:4 states that the Council *“will promote the creation of rest stops and HGV parking facilities on the freight network, including on the SRN. This will ensure drivers have convenient, well-located rest facilities which can support their wellbeing”*.

9.3 Need for HGV Spaces (Locally and Nationally)

Core Policy 65 of the WCS requires that demand for such proposals is clearly demonstrated. As such this section explores and assesses the need for overnight lorry parking in this particular location.

The government recognises the important contribution that HGV drivers make to the nation's economy

and the need to ensure drivers have access to appropriate services and facilities. Driver welfare is a key element in making driving an attractive career choice and improving lorry (and coach) parking facilities is an important part of this.

Paragraph 114 of the NPPF states *“planning policies and decisions should recognise the importance of providing adequate overnight lorry parking facilities, taking into account any local shortages, to reduce the risk of parking in locations that lack proper facilities or could cause a nuisance. Proposals for new or expanded distribution centres should make provision for sufficient lorry parking to cater for their anticipated use”*.

Circular 01/2022 (23rd Dec 2022) is the policy of the Secretary of State in relation to the SRN which should *“be read in conjunction with the National Planning Policy Framework (NPPF), planning policy and practice guidance, national design guide, National Model Design Code, Manual for Streets (MfS), local transport note (LTN) 1/20 and all other material considerations when ... authorities are ... making decisions on planning and development proposals under the Town and Country Planning Act 1990”*.

The SRN is the most heavily used part of the national road network, carrying a third of all traffic and two-thirds of all freight. The 01/2022 Circular states that *“the SRN provides critical links between our cities and other urban areas... It drives productivity and prosperity by unlocking growth, encouraging trade and attracting investment, and plays a vital role in levelling up the country”*.

With specific regard to HGV parking, government policy is clear in the Future of Freight Plan, ‘*Planning reforms for lorry parking*’ Written Ministerial Statement (8 November 2021) and the NPPF, that development proposals for new or expanded goods distribution centres should make sufficient provision for HGV drivers, which should include overnight parking and an adequate level of welfare facilities.

The need to increase provision for HGV drivers at roadside facilities is set out in paragraphs 79-82 of the 01/2022 Circular as follows:

“79. Drivers of many heavy goods and public service vehicles are subject to a regime of statutory breaks and other working time restrictions, such that roadside facilities are critical enablers of compliance with such requirements.

80. It is recognised that on certain parts of the SRN and at certain times a shortage of parking facilities for HGVs can make it difficult for drivers to find safe space to stop and adhere to requirements for mandatory breaks and rests. To alleviate the shortage, the expansion of existing facilities on the SRN is likely to be needed alongside the creation of new parking sites. As a result, existing truckstops (including closed facilities) on or near to the SRN must be retained for their continued and future use unless it can be clearly demonstrated that a need no longer exists”.

81. In areas where there is an identified need[footnote 26], the company will work with relevant local planning authorities to ensure that local plan allocations and planning application decisions address the shortage of HGV parking on or near to the SRN. In these circumstances, local planning authorities should have regard to the following spacing requirements:

- (i). the maximum distance between motorway facilities providing HGV parking (being service areas, rest areas or truckstops) should be no more than 14 miles; ...”*.

Figure 2-6 - Location of freight generators in Wiltshire

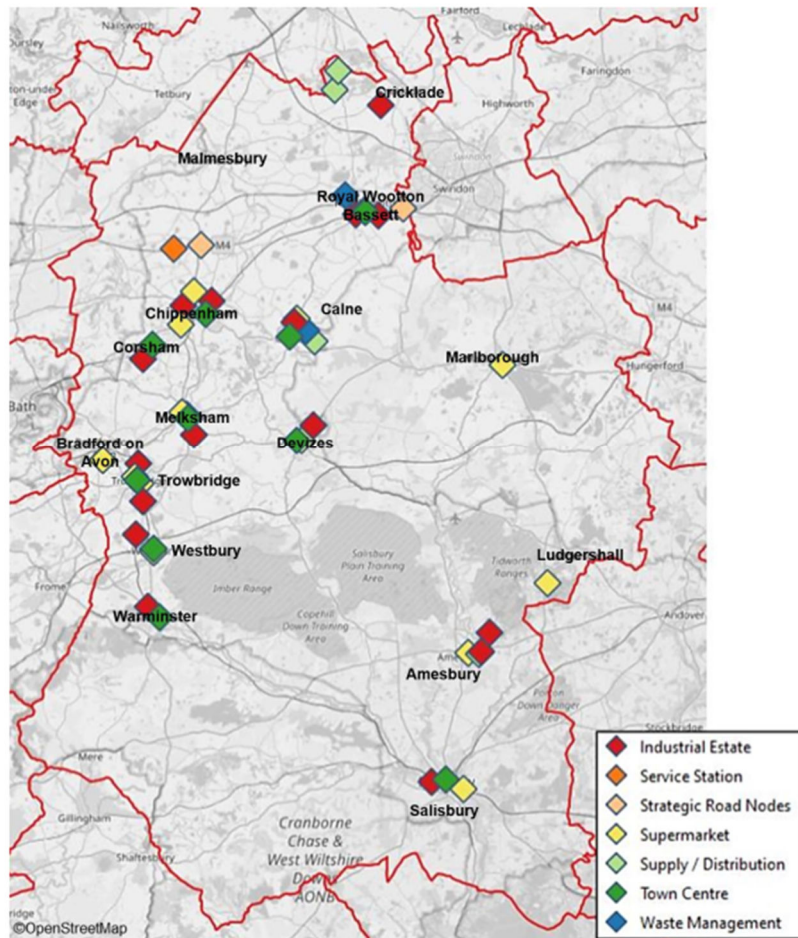


Figure 16: Image taken from LTP4 Freight Sub Strategy March 2025

It is clear from the image above that the proposed location for the development at J16 near Royal Wootton Bassett is one of the top 2 largest freight generating locations (along with Chippenham at J17 further up the M4) in the whole of the County. This would indicate that the proposed site location is sequentially optimal in terms of need and efficiency.

Further, a National Survey of Lorry Parking Research Study (Part One) 2022 ('NLPSP1') undertaken by Aecom on behalf of the Government Department for Transport (DfT) provides an accurate assessment of lorry parking provision and demand on or around the SRN in England.

The NLPSP1 highlights that 143 on-site facilities are at the defined critical level of 85 per cent full or more and that there remains a shortfall in the provision of on-site parking facilities, with 21,234 vehicles observed at on-site and off-site parking facilities within 5km of the SRN in England against an on-site capacity of 16,761. This translates into a recorded excess of 4,473 vehicles against capacity highlighting that the demand for lorry parking spaces outpaced the supply of additional spaces in recent years.

Consequently, the Department for Transport (DfT) tasked National Highways with building on this study to evaluate lorry parking facilities and identify areas experiencing high demand and insufficient provision.

The Lorry Parking Demand Assessment 2023v4 (October 2024, National Highways) confirms "the UK faces a critical shortage of secure HGV parking, estimated at around 11,000 spaces, forcing drivers into unsafe lay-bys or industrial estates, impacting welfare, safety, and recruitment, despite government funding initiatives for upgrades and new facilities".

Demand by LPA area

In conducting a comprehensive assessment, a ranking system was developed that evaluated local authorities by comparing the severity of their lorry parking issues in relation to each other. This system allows for a better understanding of which areas warrant closer inspection and attention, as demonstrated below in Figure 0-2.

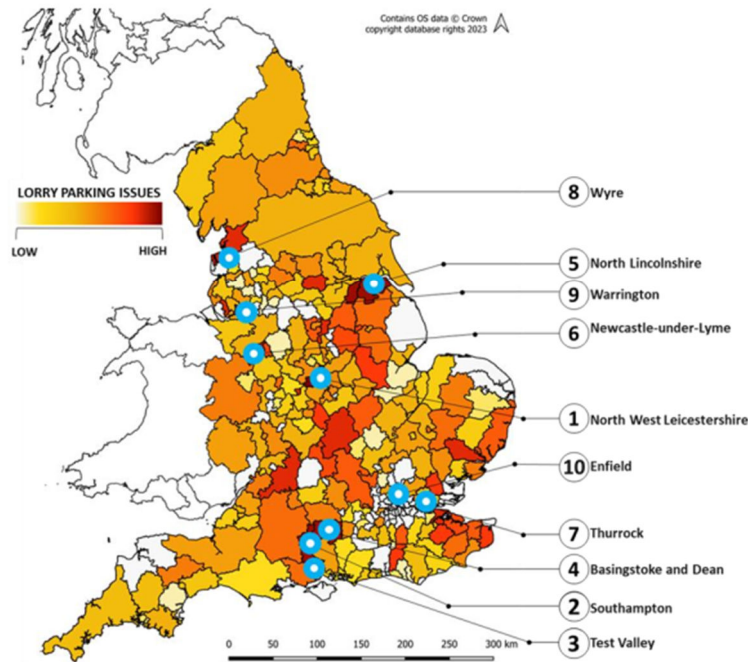


Figure 0-2: Lorry parking issues by local authority

Figure 17: Lorry Parking Issues by Local Authority from The Lorry Parking Demand Assessment 2023v4 (October 2024, National Highways)

This figure shows that whilst Wiltshire is not experiencing the most significant lack of lorry parking (ie the highest critical utilization), it is shown as dark orange indicating a high level of lorry parking issues. Whilst not the worst in terms of HGV parking facilities provision, Wiltshire is noted in the National Highways Lorry Parking Demand Assessment 2024 document as being in the top 10 areas which have critically utilised lorry parks as shown below. Critically utilised means those running at maximum capacity indicated as frequently being at 85% + capacity.

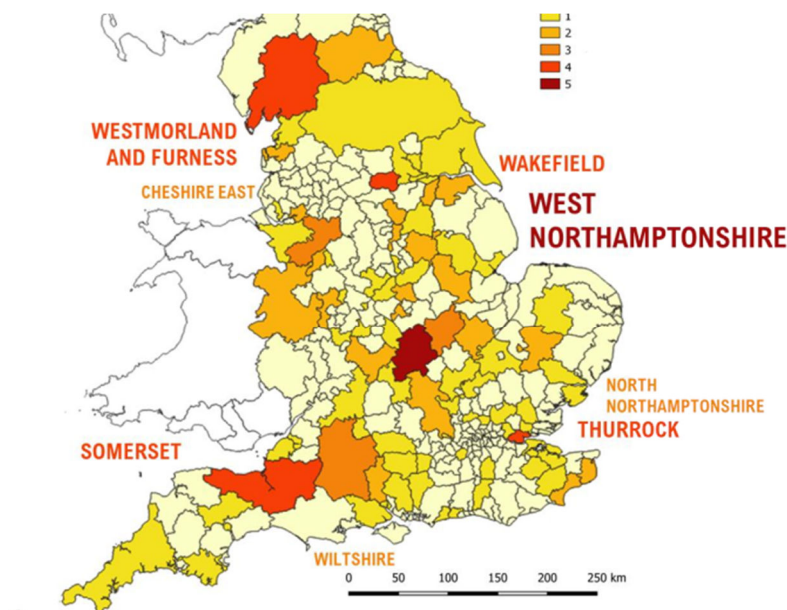


Figure 6-6: LPAs by number of Lorry Parks critically utilised

Figure 18: LPAs by number of critically utilized lorry parks from The Lorry Parking Demand Assessment 2023v4 (October 2024, National Highways)

The applicant looks into these figures further as part of their submission. The applicant looked in detail at Wiltshire Council's provision of HGV parking facilities using reference to the National Lorry Parking Survey Part One (NLPSP1) as well as the National Highways data and their own survey figures. It is noted that the existing level of capacity for HGV parking was categorised by the NLPSP1 based on recorded levels: Critical (greater or equal to 85%), Serious (70% to 84%) and Acceptable (less than 69% capacity).

Based on the data available and survey results, the applicants provide capacity statistics for the surrounding local HGV parking facilities within Wiltshire and these are outlined in Table 1 below.

Table 1: HGV Parking Facilities Capacity		
HGV Parking Area	Capacity	Source
Leigh Delamere (eastbound)	90% (Critical)	NLPSP1
Leigh Delamere (westbound)	58% (Acceptable)	NLPSP1
Chippenham Pit Stop	96% (Critical)	NLPSP1
Swindon Truck Stop	100% (Critical)	NLPSP1
Chieveley Services	83% (Serious)	Eddisons
Membury Services (eastbound)	74% (Serious)	Eddisons
Membury Services (westbound)	98% (Critical)	Eddisons
Sutton Scotney (northbound)	103% (Critical)	Eddisons
Sutton Scotney (southbound)	100% (Critical)	Eddisons

Table 1: showing HGV parking facilities capacity taken from Applicant's Planning Statement

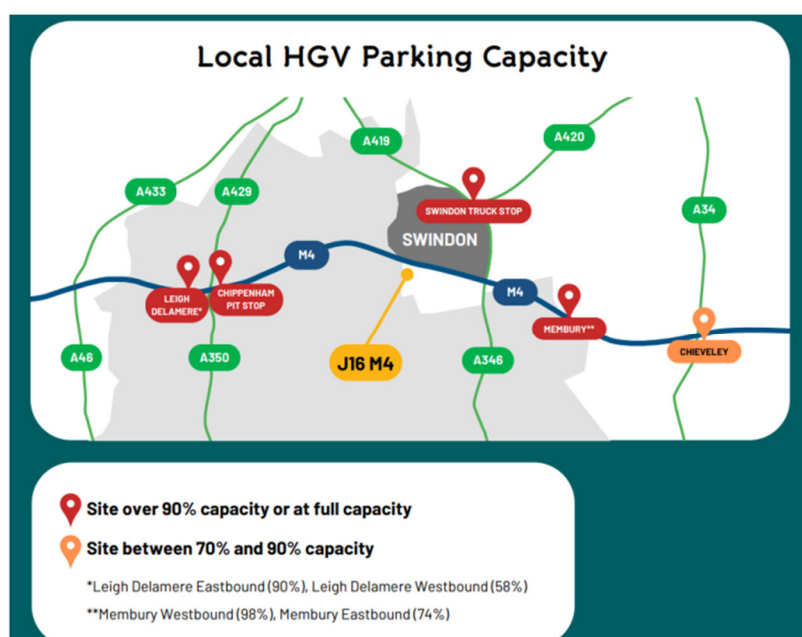


Figure 19: location and capacity of the existing rest facilities on M4 taken from Applicant's Planning Statement

To provide a more detailed context, surrounding laybys were also assessed by the applicants transport consultants. Laybys become a last resort for lorry drivers when appropriate facilities cannot be accessed. The surveys were undertaken between 7pm and 12am. 20 no. laybys were surveyed in 15km radius from the centre of the Site. The data collated showed that anywhere between 72 to 92 HGV's were parked in the immediate area for an overnight rest break. The number of lorries that use the laybys for resting are also evident off Junction 15 as well as Junction 16. Driving down the A36 in the morning the case officer noted a high number of HGVs are always evident in the laybys nearest to the M4 junctions.

This primary data and empirical evidence provides further weight demonstrating the critical need for additional and improved safe and secure HGV parking in the immediate location.

As above, when a specific need for HGV parking has been identified, Paragraph 81 of Circular 01/2022 is engaged and the maximum distance between motorway rest areas should be 14 miles. It is observed that Leigh Delamere and Membury Services are the immediate motorway services in each direction from the Site. The distance between the HGV parking areas at these services is summarised below:

- Leigh Delamere (East) to Membury Services (East): 28.2 miles
- Membury Services (West) to Leigh Delamere (West): 28.3 miles
- Leigh Delamere (West) to Proposed Site Access: 14.6 miles
- Proposed Site Entrance to Leigh Delamere (East): 14.5 miles
- Membury Services (West) to Proposed Site Access: 14.3 miles
- Proposed Site Access to Membury Services (East): 14.6 miles

At a mean of 14.5 miles from the nearest established existing services in either direction, this site meets the criteria required by National Highways and the Government in Circular 01/2022. This makes this site sequentially the most optimum location to combat the shortfall in lorry parking on this section of the SRN.

Safety & Security

The submitted Design and Access Statement (ref: M49/900 Rev D, dated May 2024) ('DAS'), considers the security and safety of the proposed MRA in detail to ensure that all drivers (including resting HGV drivers) and vehicles are secure. Whilst specific detailed design is a matter for a later reserved matters application, the developer has already discussed the application with Wiltshire Police and a Crime Prevention Design Advisor. The DAS confirms that various security measures will be provided including site wide CCTV, ANPR checks, security fencing, internal cashpoints, natural informal surveillance between and around buildings and parking, specially designed landscaping and an unmarked police room on site in the amenity building.

Having regard to all the above, the proposed development would address an immediate and pressing need for secure HGV parking in Wiltshire and nationally. It would also benefit the wider SRN and improve highway safety for all road users. Consequently, the need is considered to be established and provision of this additional HGV parking is afforded substantial weight in favour of the application in the planning balance.

9.4 Need for EV Charging Spaces (Locally and Nationally)

The Department for Transport's Road Investment Strategy 2: 2020-2025 states *"In a changing world, where the demands on our SRN and the opportunities provided by new technology to meet those demands are developing rapidly, our strategic vision seeks to ensure that the SRN is 'future ready', whatever may emerge"*.

The Draft Road Investment Strategy 3: 2026-2031 (August 2025) states *"It is essential that the road sector plays its part in the goal of decarbonising the economy as well as being resilient to the effects of a changing climate"* (page 4).

Circular 01/2022 confirms the SRN also has an essential role in supporting the government's commitments

in Decarbonising Transport: A Better, Greener Britain (“the transport decarbonisation plan”).

The government's Net Zero Strategy: Build Back Greener (2021) aims for the sale of new petrol and diesel vehicles to cease by 2035, helping drive the decarbonisation of transport. The Zero Emission Vehicles (ZEV) Mandate requires that 80% of all new vehicles sold in Great Britain are zero-emission by 2030.

Taking Charge: The Electric Vehicle Infrastructure Strategy 2022 has the target of securing 300,000 public charge points as a minimum in the UK by 20230.

Central Government recognises the importance of a widespread, reliable refuelling and recharging network to provide confidence in the commercial viability of zero emission HGVs. By 2035, the government expects around 6,000 high-powered, open-access chargepoints (150-350 kW capable) to be installed across the SRN and to ensure that there is a high-powered and open-access charging network ready to meet consumer demand for EVs ahead of need, and to enable the phase out of new conventional petrol and diesel cars/vans by 2030 and HGVs by 2040.

In line with this goal, and Wiltshire Council's declaration of a climate emergency, the Council is focused on encouraging the use of electric vehicles in Wiltshire to help reduce the county's emissions through a commitment to improving the charging infrastructure to support those who drive electric vehicles.

Wiltshire Council Local Transport Plan 2025-2038 (LTP4) contains policy I1 which seeks to facilitate and encourage move to low and zero emission vehicles.

The Council's Freight Sub Strategy adopted in March 2025 aims to deliver on the vision and objectives of the LTP4, through developing policies to decarbonise and futureproof the county's freight networks, support the delivery of economic growth,

The Electric Vehicle Infrastructure Sub-Strategy (2025) sets out the policies for electric vehicle infrastructure (EVI) across Wiltshire, providing the strategic direction for EVI measures for the period up to 2027.

In the Government's 'Electric vehicle charging device statistics (July 2023)', the south west ranked 6th lowest of out 12 regions across the UK, for EV charging points per 100,000 population.

The proposed development will be one of the first Motorway Rest Areas where all car parking spaces will possess EV charging capabilities, with 50 'ready to use' charging points delivered on opening and the remaining spaces equipped with passive charging capabilities that can be brought into use in the future. All HGV spaces will have the capability to deliver EV charging facilities in the future.

The applicants have undertaken analysis into current trends to understand how many EV chargers will be needed at Moto destinations. The applicants have collected and submitted primary data in support of this application and provide predicted figures on the quantity of EV charging points needed across all their current sites. The predicted need for EV charge points are:

- 2023: 773 chargers;
- 2025: 1,045 chargers;
- 2030: 2,217 chargers; and
- 2040: 4,707 chargers.

Leigh Delamere (the nearest services to the West) has 9 charging stations, Leigh Delamere (the nearest service station to the East) has 3 charging stations, Membury Services (West) has 2 charging stations and Membury Services (East) has 2 charging stations.

The proposed 50 EV chargers that would be delivered upon opening of the proposal would increase availability by 312.5% on this stretch of the M4 SRN. The additional location for EV charging closes the gap between charging points.

The additional 50 no. immediately active EV spaces and 191 no. passive charging points will significantly help to boost the current provision and will contribute towards meeting the need for EV charging provision within the UK aligning with the Government's intention to cease the sale of new petrol and diesel cars and vans by 2035. Moreover, these facilities will continue to grow and expand throughout the lifetime of the development as power provision and technology evolve.

The Wiltshire Council EV Infrastructure Team have been involved in discussions about the proposal and have been consulted. The Team's Lead Officer confirms that the proposal will

"help accommodate the national growth in electric vehicle usage, especially as stimulated by the Zero Emission Vehicle (ZEV) Mandate" and "offers ultra rapid DC charging units, offering the quickest means to charge a vehicle and are the suitable choice for the main use case of the MRA: providing short dwell charging to vehicles mid-journey on the M4 motorway".

A secondary use for the MRA EVI provision is to provide electrical vehicle charging options to local communities, with the MRA site easily accessible from the surrounding road network. This will be of benefit to nearby residents who either don't have convenient local electrical vehicle charging or have access to limited charger numbers which may all be in use.

The proposal compliments the draft Wiltshire Council EVI Strategy which identifies that the council looks to the market to provide the majority of charging provision in the County. The proposed MRA site will help in doing that for the residents and settlements of rural Northwest Wiltshire.

The EV Infrastructure Team Lead Officer concludes that the applicant has *"communicated a realistic and pragmatic approach to increasing the EV charging provision over time... This will enable quicker and cheaper provision of increased charger numbers in line with the growth of electric vehicles adoption.*

Growth of charging provision is dependent on increasing the power supply to the site. The applicant has been in communication with the regional Distribution Network Operator (DNO) to identify the strategic long term needs and negotiate initial on-site power requirements. They have also demonstrated a willingness to adopt technologies which reduce the burden of EV charging on the national grid, such as demand management and battery storage".

Consequently, the proposed development will make a critical contribution towards EV charging at both a national and local level and broader Government targets. It is considered that this should be afforded substantial weight in the planning assessment.

9.5 Significant Job Creation and Investment

The adopted Wiltshire Core strategy has a number of strategic objectives. Strategic objective 1 is delivering a thriving economy and to encourage a buoyant and resilient economy to enable development to take place and encouraging economic viability providing local jobs for Wiltshire's population.

The NPPF states that *"Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways one of these is an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;"* (Paragraph 8)

"Planning ... decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future". (Paragraph 85).

In addition to the construction jobs that would be generated as part of the proposal, the long-term

operational period would likely see a significant amount of additional spending from all users of the SRN in a fuel filling and EV charging and retail spending capacity. The application submission confirms that on opening, a minimum of 150 new full-time jobs will become available to local residents and the proposal represents a circa £30million investment for Wiltshire's Strategic Infrastructure.

The NPPF requires significant weight to be placed on such economic growth and as this is a primary strategic objective of the WCS, it is considered that substantial weight should be afforded to these economic benefits.

9.6 *High Quality Design, Sustainable Construction and Biodiversity Enhancements*

Core Policy 41 of the WCS requires 'Sustainable construction and low-carbon energy' aims to ensure that developments incorporate design measures to combat climate change through sustainable design methods.

The NPPF states that good design is a key aspect of sustainable development and that the planning system should support the transition to net zero by 2050. It should help to ... support renewable and low carbon energy and associated infrastructure. It goes on to state when determining planning applications for all forms of renewable and low carbon energy developments and their associated infrastructure, local planning authorities should give significant weight to the benefits associated with renewable and low carbon energy generation and the proposal's contribution to a net zero future.

Paragraph 134 states: "...significant weight should be given to:

- a) development which reflects local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes; and/or*
- b) outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.*

The Applicant has followed a 'sustainability first' approach in the design generation of this proposal. This development will be one of the first Motorway Rest Areas where all car parking spaces will possess EV charging capabilities, with 50 'ready to use' charging points delivered on opening. A palette of high-quality materials has been indicated which reflects the low carbon, sustainable aspirations of the development and will include a green roof as well as solar panels. This can be secured through condition.

Whilst it is acknowledged that it will also provide a fuel filling station for petrol users, the provision of the EV charging superhub on opening is a significant benefit which is afforded significant weight. The proposed amenity would meet BREEAM Excellent standards and this would be secured by condition. It will achieve above the required statutory amount of Biodiversity net gain and be a modern fit for purpose motorway rest area raising the standard of design in this sector, which the NPPF requires significant weight to be afforded to.

Accordingly, in terms of principle of development the proposed development addresses the pressing national and local need for secure, safe, modern HGV parking. It would provide the largest Electric Vehicle charging hub in Wiltshire and one of the largest in the country with 50 EV spaces on opening and future proofed for easy increase in these numbers as technology and power provision allow, including crucially for electric HGVs.

The proposal represents a significant economic investment in much needed modern infrastructure to support the safer operation of the SRN, improving the quality of HGV driver welfare whilst contributing to meeting the UK net zero targets.

The proposal would provide a net gain in biodiversity and a significant amount of job creation for local residents. Added to this is a scheme which includes high quality design aspirations with high sustainability credentials raising the standard of design in this sector for necessary national infrastructure with no significant detrimental impact on local residents and occupiers.

Accordingly on this basis it is considered that the proposal meets the requirements of CP48, CP65 and CP66 Strategic Road Network. The proposal remains in accordance with the adopted Wiltshire Core Strategy, Local Transport Plans 3 and 4, the National Planning Policy Framework 2024, National Planning Policy Guidance, Circular 01/2022 and associated guidance.

The proposal is therefore acceptable in principle and does not represent a departure from the local development plan subject to the following technical considerations.

9.7 Mineral Resource: The application site lies in a Mineral Safeguarding Area. The area is safeguarded due to the presence of clay associated with the Kimmeridge Clay Formation and the underlying Ampthill Clay Formation.

The applicant has submitted a Mineral Resource Safeguarding Assessment with the application (by GWP, reference no. 230905v.02 dated September 2023). This report confirms that the site lies within an area which is safeguarded due to the presence of clay and concludes that no viable mineral resource would be sterilised by the proposed development. It is recommended that any clay excavated during works undertaken for the proposed development, which is surplus to on-site requirements (e.g. for landscaping), is not classified as a waste, is not disposed of to landfill and is made available for export from the site for landfill lining. This is recommended to be secured by condition.

Subject to this condition, it is considered that the proposed development is acceptable with regard to Policies MCS6 and MDC4 of The Wiltshire and Swindon Minerals Core Strategy 2006 – 2026 and Development Control Policies Development Plan Document as well as the National Planning Policy Framework.

9.8 Retail Impact: The application is not specifically for retail but a mixed use site for a motorway rest area. As such there is some ancillary retail proposed as part of the development to be contained within the proposed amenity building. It is considered that by the nature of the proposal some ancillary retail is necessary to service the users of the site from the SRN. These users would be unlikely to otherwise use existing facilities and services elsewhere given that the primary purpose of the proposal is a quick refueling stop. Sequentially this proposal is in the optimum location and would be unlikely to materially harm the vitality and viability of other town center uses, simply because the users would be highly unlikely to go into the town centers otherwise. It is a different footfall / catchment of users than those who would be using the town centre services.

Accordingly, it is considered that the proposed ancillary retail on the site is acceptable and would not harm the vitality, viability or economic interests of business/service providers within the villages and closest town centres (including Swindon) and thus the proposal is acceptable in this regard.

9.9 Flood Risk and Drainage: Adopted WCS CP67 requires all new development to include measures to reduce the rate of rainwater run-off and improve rainwater infiltration to soil and ground (SuDs). Whilst paragraph 181 of the NPPF requires local planning authorities, when determining planning applications, to ensure that *“that flood risk is not increased elsewhere. Where appropriate, applications should be supported by a site-specific flood-risk assessment”*.

The submitted Flood Risk Assessment and Surface Water Drainage Report (produced by Pell Frischmann, reference 784-B048803, dated November 2025) confirms that the site is located wholly within floodzone 1 with no risk of groundwater flooding. The FRA 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.

The site is generally at low overall risk of surface water flooding with some slight areas of low risk to the east and west of the site associated with topographical depressions. A small field drain is within the

site boundary along the eastern boundary of the site which likely serves a land drainage function. Several smaller unnamed watercourses are found immediately surrounding the site boundary and in the wider area. Some of these form part of the highway drainage network, and others provide a land drainage function to the agricultural land, with wider connectivity to watercourses to the east. In terms of the risk of surface water flooding, the majority of the subject site's developable areas are at low risk, with surface water to be managed on-site utilising SuDS.

A surface water drainage strategy has been prepared for the submitted scheme, and details are provided as part of the Sustainable Drainage Report ref: 107846-PEF-ZZ-XX-RP-CD- 000001. The strategy is based on discharging surface water runoff from the site at the equivalent greenfield rate, with the additional volume stored within attenuation basins before being discharged to the local watercourses, following the existing watersheds across the site.

Additional SuDS features are proposed to complement the strategic attenuation basins, and the specific design detail will be subject to a condition requiring such details to be submitted at reserved matters stage. This would include features such as permeable paving, rainwater butts, tree pits and rain gardens. These will act as source control measures by capturing and managing runoff close to its source, while providing amenity and biodiversity improvements, as well as improving the quality of runoff.

The Council's drainage engineers have raised no objection to the proposal subject to conditions requiring

- a detailed surface water drainage strategy to be submitted alongside reserved matters demonstrating how the surface water hierarchy has been applied;
- detailed drainage calculations with drainage drawings showing the pipe/link & manhole/ node numbers used in the calculations as well as a plan showing the cross sections and design of any attenuation pond and its components;
- runoff calculations which demonstrate that the required 20% betterment against greenfield rates has been achieved for all storm events between the 1 in 1 year and the 1 in 100year return period storm events.

Thames Water have raised no objection but due to the presence of water mains in proximity to the site, have requested that an informative advising the developer of their rights and obligations is submitted in the event of any grant of permission.

National Highways have raised no objection subject to surface water drainage conditions ensuring no water enters the motorway.

It is noted that the hydraulic modelling for a 1 in 100-year storm event plus 40% increase for climate change indicates that the development proposed surface water layout floods during various storm durations, which could impact the downstream land drainage system and National Highways M4 culvert.

National Highways expect the applicant to review their hydraulic modelling as part of a detailed drainage design to be submitted with reserved matters which should also be submitted for NH review and acceptance in respect of the SRN.

It is also noted by National Highways that the proposal to install a new roundabout on the B4005 could 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-XXDR-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. This will therefore need to be evidenced and addressed as part of the detailed drainage design for the development at reserved matters stage. National Highways considers that this matter can be addressed by a suitable planning condition to secure the submission of a detailed drainage design 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.

The Environment Agency have also been consulted and raise no objection subject to conditions requiring details of foul drainage to be submitted with reserved matters as well as pollution prevention measures to be incorporated in to the construction and operational period of the development specifically with regard to surface water drainage and storage, construction methods and in the unlikely event of any unidentified contamination being found during development.

Subject to the above conditions being applied, it is considered that the development will not have an adverse impact on the flood risk on the site and will not result in increased flood risk elsewhere thereby according with WCS policy 67 and 68 as well as provisions of the NPPF and other associated guidance.

9.10 Loss of Agricultural Land: The NPPF paragraph 187 states that “planning ...decisions should *“contribute to and enhance the natural and local environment by ...recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland”*”.

The site’s agricultural land classification is mapped as follows:



Figure 20: Extract from Natural England's Magic Map (Agricultural Land Classification Layer)

The applicant has submitted an Agricultural Land Quality Assessment (produced by Kernon Countryside Consultants reference KCC3518ALQC dated September 2023). The survey confirms that the site is subgrade 3B moderate quality. Land to the north and west of the site has also been graded as subgrade 3B and is therefore considered not to be best and most versatile land and the proposal is acceptable in this regard.

9.11 Layout, Design and Visual Impact: As this application is in outline with access being the only detailed matter open for consideration at this stage, the design, layout, scale, appearance and landscaping are not matters to be assessed at this stage but would need to be addressed as part of any future reserved matters application. It is, however, necessary for the Council to be satisfied that the proposed principle of development can be adequately accommodated across the application site, to ensure that a high standard of design can be achieved.

Core Policy 51 ('Landscape') of the WCS states that new development should protect, conserve and where possible, enhance landscape character. The policy requires applications to demonstrate how development proposals conserve and where possible enhance landscape character through sensitive design, landscape mitigation and enhancement measures.

Core Policy 57 of the adopted WCS requires a "high standard of design" for all new developments. This policy requires developments to "create a strong sense of place through drawing on the local context and being complementary to the locality" with applications being accompanied by appropriate information to demonstrate how the proposal would "make a positive contribution to the character of

Wiltshire" and sets out a list of criteria that proposals for new development must comply with.

In addition, paragraph 131 of the Framework seeks the *"creation of high quality, beautiful and sustainable buildings and places..."*

Paragraph 135 of the Framework sets out a series of criteria which planning policies and decisions should ensure developments create, including being of high quality over the lifetime of the development, being visually attractive and sympathetic to the local character and history, creating a strong sense of place and creating places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users.

Paragraph 136 makes special reference to trees within developments stating that trees *"make an important contribution to the character and quality of urban environments and can also help mitigate and adapt to climate change"* and continues to state that both planning policies and decisions *"should ensure that new streets are tree-lined"*.

This outline application has been accompanied by an illustrative masterplan (drawing no. 915-210 Rev F), development parameter plan (drawing no. 915-205 Rev F), in addition to a Design and Access Statement (DAS) (Rev D, dated May 2024). These plans and documents demonstrate the developable area and illustrate how the site could indicatively be laid out. A Computer Generated Image ('CGI') of how the proposed development could look once it has been built out has also been provided.



Figure 21: Computer Generated Image of indicative proposed design taken from the submitted DAS May 2024

The Design and Access Statement (May 2024) sets out the vision for the development. The proposed Motorway Rest Area ('MRA') is a junction facility that would be accessible from both directions of travel on the M4 at existing Junction 16.

The Illustrative Masterplan indicates that the overall MRA proposal would comprise of the following main elements:

- An Amenity Building containing hot and cold food offers, shops for essential goods, lavatories, pay phones, shower and seating / resting areas. This building would have a footprint of circa 2,300m² and a gross external floor area (including a potential mezzanine floor) of circa 3,500m²; and would sit under an innovatively designed, sweeping green roof which would assist with

assimilating the scheme into its setting;

- A Filling Station shop and payment point, with a footprint of circa 250m² with its own green roof;
- A Fuel Filling Forecourt canopy with 4 islands (8 filling points) for cars, vans and small commercial vehicles. This would be located immediately to the north of the Amenity Building, underneath its own roof canopy with a potential to house a PV array;
- A separate stand-alone Fuel Filling Forecourt canopy with 2 islands (3 filling points) for HGVs and coaches, again underneath its own roof canopy with a potential to house a PV array;
- A means of access from the B4005. This would comprise a new roundabout arrangement along the B4005 providing entrance and exit points to the site;
- Parking for up to 241 cars (including 20 accessible spaces), 63 HGVs (to include an abnormal load bay), 6 coaches, 7 caravans (including 1 space for disabled users), and 12 motorcycles.

The parking provision would include a large number of electric vehicle charging stations (50 charging spaces to be provided immediately) and be future proofed to provide the space for potentially 100% EV parking. All parking would be free of charge for a minimum of 2 hours and the level of provision meets the relevant standards for an MRA.

- Surface water drainage infrastructure, forming part of a site-wide sustainable drainage system;
- Sub stations and other services points and associated works;
- On-site hard and soft landscape scheme, together with earthworks across the site and the provision of screen mounding in part by way of traditional bunding. The proposed landscape areas would incorporate:
 - o A Children's Play Area adjacent to the amenity building;
 - o New areas of structural, native landscape planting;
 - o Habitat creation works;
 - o Land management techniques to enhance local ecological land value/potential.
- Other associated infrastructure including fencing, lighting and signage.

The MRA is proposed to be open 24 hours a day, for 365 days of the year. On this basis, and in light of the provision outlined above, the scheme meets the relevant requirements for an MRA, necessary to qualify for signage on the motorway network.

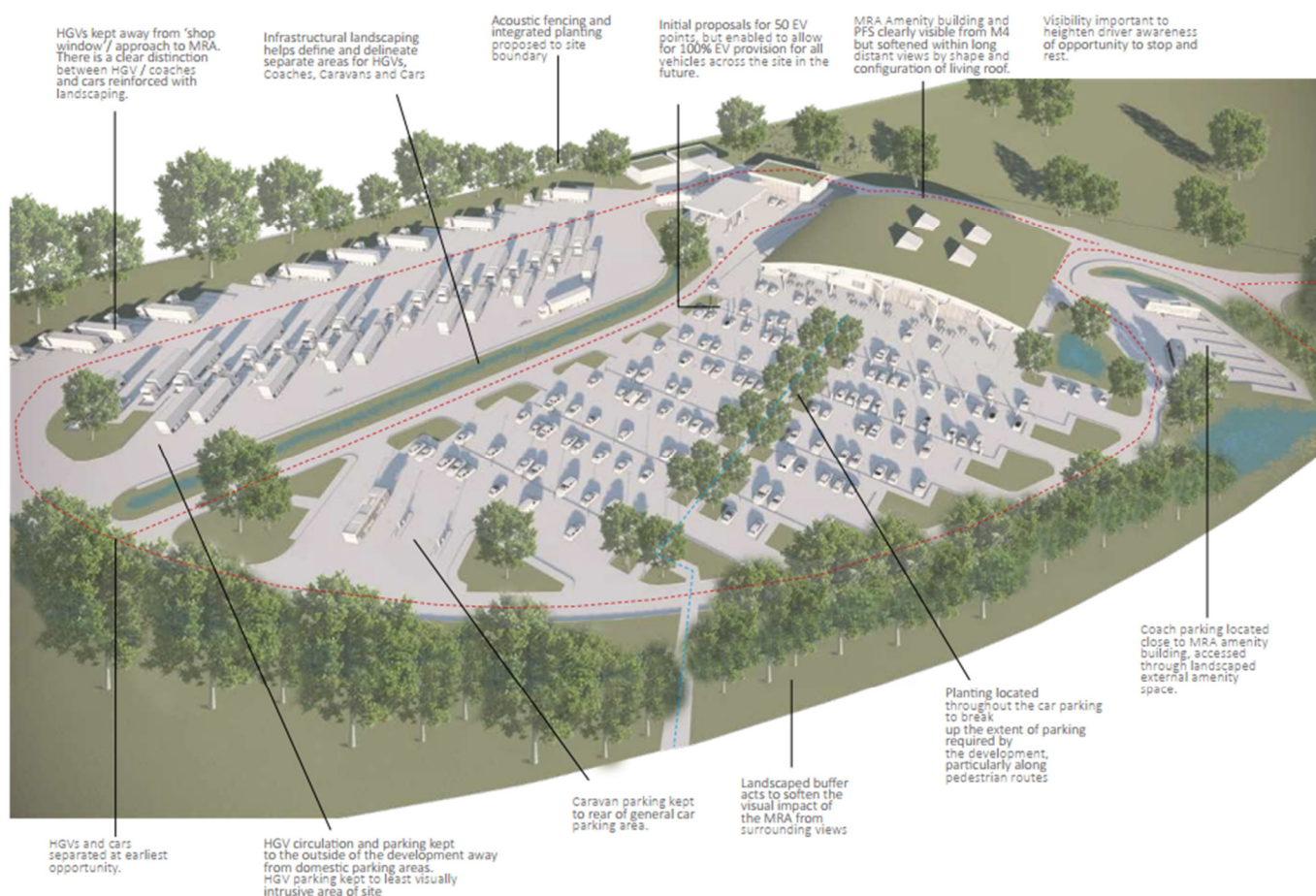


Figure 22: Proposed illustrative site CGI taken from DAS May 2024

The proposal also includes significant net gains for biodiversity. In terms of the design and appearance of the proposal and the overall layout of the site, including waste provision details, these would be matters for any future reserved matters submission.

The Waste & Recycling Officer has confirmed that non-residential premises require suitable storage space for waste containers that is accessible to a RCV. Applicants should estimate the type and quantity of waste generated by the commercial premises and plans should demonstrate that the space is suitable for the waste generated, preferably with containers drawn in situ. Tracking should show that the RCV can access the storage point or a designated collection point. This is matter for the detailed design stage.

A condition is recommended to be attached to the grant of any permission to secure the key principles and commitments set out in the parameter plans and DAS to deliver a high-quality design at the Reserved Matters application stage, together with a condition regarding details of waste storage and recycling and disposal.

Safety and Security – Designing out Crime: The Wiltshire Council Paragraph 96 The National Planning Policy Framework highlights the importance of achieving safe and accessible environments where crime and disorder, and the fear of crime do not undermine quality of life, or in the context of the development, the quality of the user experience.

As part of the submitted Design and Access Statement ref M49/900 Rev D dated May 2024) ('DAS'), the applicants have given close consideration to the security and safety of the proposed MRA to ensure that it does not attract antisocial behaviour and will ensure that drivers (including resting HGV drivers) and vehicles are secure.

Sustainability and Climate Change: WCS Policy CP41 requires new development to incorporate design measures to reduce energy demand and for major planning applications to be supported by a Sustainable Energy Strategy.

In terms of transport paragraph 104 states that “transport issues should be considered from the earliest stages of plan-making and development proposals, so that..... opportunities to promote walking, cycling and public transport use are identified and pursued”.

In terms of the future national direction of travel the 10 Point Plan, Net Zero Strategy, Heat and Buildings Strategy, the Sixth Carbon Budget and Powering Up Britain are very clear. The intentions include:

- More journeys by public transport, walking and cycling;
- More electric cars; and
- More renewable energy and storage technologies.

This application is supported by a BREEAM Sustainability Champion Report (by Encon Associates August 2023 ref A5991) demonstrating the ability of future reserved matters proposals to meet BREEAM Excellent and a Sustainable Construction & Energy Statement (produced by SDA October 2023 Ref: 3449-SDA-ZZ-ZZ-RP-EN-00101) which sets out key sustainability measures for the proposal including using low-impact materials; minimizing water consumption; reducing energy demand; and, utilising renewable energy options.

The Council's climate officer has provided comment on this application and has offered support and encouragement for the principle of providing important infrastructure that will support the transition to low carbon transport whilst maintaining social mobility. The use of roads for the movement of goods and people is engrained in how our society functions and so whilst the climate team would support the principles of 'avoid' and 'shift' from private vehicle use, the principle of 'improve' is also important. 'Improve' includes a shift from petrol and diesel vehicles to ultra-low emission vehicle alternatives such as electric vehicles (EV), biofuel HGVs/coaches and green hydrogen HGVs/coaches.

Officers have reviewed the BREEAM Pre-Assessment and note that credits to meet and slightly exceed the minimum threshold for BREEAM “Excellent” are targeted. The applicants have also indicated the potential to score “Outstanding”. At this stage, the proposal is outline only and technical design is only likely to be developed in the future. Therefore, subject to a condition to secure BREEAM Excellent certification post completion of the development then the proposal will satisfy this element of CP41 would be likely to satisfy emerging policy in relation to BREEAM.

The Sustainable Energy Strategy addresses the requirement of CP41 to outline the low carbon strategy for the proposal. The scheme is also to provide an external lighting scheme that has achieved a BREEAM rating of excellent. Given that this is an outline application and the scheme is at concept design stage, it is proportionate and appropriate. It sets out a degree of ambition with a commitment to be an electrified building, taking a fabric first approach to minimise energy and also looking to use low carbon and renewable technologies. The strategy also sets out positive suggestions and possibilities in relation to ensuring the scheme is low in embodied carbon. A condition to require a further Sustainable Energy Strategy to be submitted concurrently with any future reserved matters applications is recommended to ensure that the proposal achieves its commitment to meet the set targets.

9.12 Landscape and Visual Impact: In terms of landscape impacts, landscaping appearance and design are reserved matters but it is important to assess the principle of the proposed development in landscape terms at this outline stage.

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 site itself does not lie within any national landscape designations. 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. Notwithstanding this, the site would be viewed in the context of the existing significant infrastructure of Junction 16, the M4 and the existing established high density urban area of Swindon.

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.

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.

Initially the Landscape officer raised objections due to a lack of information demonstrating sufficient planting and landscaping of the site. The application has been accompanied by a Landscape and Visual Impact Assessment (LVIA) and Addendum addressing in part the concerns raised by the landscape officer. The landscape concerns about sufficient landscape planting and tree planting throughout the site would be matters for a future Reserved Matters application(s), as landscaping and layout are not matters open for the Council to consider at this stage.

The revised Parameters Plan (Drawing ref: 915-205) now includes 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.

Concern was raised about the impact of vehicle headlights. The direction of travel of HGVs through the HGV parking area do 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 through detailed design at reserved matters. An HGV Headlight Spill Plan has been provided which proposes a 2m close boarded fence along the motorway boundary and given the topography of the site, such that it is set in a dip, it is considered that detailed design and appropriate boundary treatments can be secured to ensure that this would not result in harm to the highway or locality at Reserved matters stage.

National Highways also raise no objection in this regard and are content with the matter to be conditioned to ensure a robust, landscaping scheme is secured for the site. Highway visibility splays have been adequately demonstrated and detailed highways works will be required through s106 and a separate tandem s278 agreement.

Green roofs and solar panels will be incorporated within the final design as shown on the proposed parameters plan (to be conditioned) and details for these can also be secured through condition.

National Highways have requested a Glint and Glare Survey to be submitted for review with future reserved matters to ensure no adverse impact to users of the M4 and associated slip roads, this is considered acceptable and recommended to be secured through condition.

National Highways 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 is therefore considered necessary for the applicant to submit a detailed Boundary Treatment and Landscape Plan at reserved matters stage to ensure there would be no impacts on the SRN. This will need to be accompanied by an associated Planting Schedule and maintenance strategy.

National Highways also request 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 as part of the reserved matters which is recommended to be conditioned which would protect any trees that may be within our estate. Accordingly all matters of concern raised by the landscape officer have been adequately addressed and the proposal is acceptable in this regard.

PROW

The nearest recorded Public Right of Way is LTRE6, to the east of the site, heading East to the Boundary with Swindon where it terminates with no onward connection. The start of the Eastern spur of LTRE6 is on the edge of the application site. Whilst this path has no onward connection the path must still be accessible however the PROW officer has requested £3,500 towards improvements on the section of LTRE6 to the west of the proposed development as officers believe this path will see an increase in use as motorists stop for a break and walk the dog. The money would be spent on surface improvements and Access furniture upgrades. This is considered acceptable and can be secured as part of the s106.

Trees

The application is supported by an Arboricultural Impact Assessment (produced by) and a Tree Retention and Removal Plan. There are trees on site and the surrounding area which are protected by TPO 51 which was made in 1975. There are three groups of trees located on this proposed site G22, G23 and G24. The trees noted within these groups are Elms and one Oak tree although the Oak tree is outside the application site. Due to Dutch Elm Disease the protected Elm trees are no longer in existence which would leave the Oak tree which is being retained and is not on the application site.

Three trees T4, T11, and T13 have been given a 'U' category and should be removed for reasons of sound management. Two sections of H3 which are situated on the eastern boundary will be required to be removed to facilitate field access. Mitigated planting should be included in any proposed landscaping scheme at reserved matters and can be secured through condition. All works should be carried out as specified in the Arboricultural Impact Assessment & Arboricultural Method Statement which incorporates the Tree Protection Plan dated 18th September 2023. The arboricultural officer raises no concern or objection and as such subject to conditions, the proposal is acceptable.

9.13 Highways: Strategic Objective 6 of the WCS requires the strategy to ensure that strategic and local transport needs are managed in a sustainable manner through the provision of essential infrastructure appropriate place shaping and the provision of new and improved infrastructure will be positively supported provided there is no detrimental environmental impact. It seeks to ensure that strategic transport corridors are where appropriate improved in a sustainable way.

Criterion xiv of CP57 of the adopted WCS requires proposals to satisfy the requirements of CP61. Policy CP61 requires new developments to be *“located and designed to reduce the need to travel particularly by private car, and to encourage the use of sustainable transport alternatives”*. CP61 also requires in criterion ii that proposals would be *“capable of being served by safe access to the highway network”*. In addition, CP64 of the adopted WCS requires adherence to parking standards.

The current Freight Strategy recognises the need to achieve a more sustainable distribution of freight and to support the priority themes of climate change and economy. It is recognised that the overwhelming majority of freight distribution within the county is made by road, and that this is likely to remain so in the foreseeable future. This has been reflected in the freight strategy policies as part of the latest Local Transport Plan LTP4.

In addition to the abovementioned policies, paragraph 116 of the NPPF states that developments

“should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios”.

It is important to remember that this outline application is only seeking detailed consideration on the proposed means of vehicular access, with all the other matters, including internal road layouts, being reserved for future detailed consideration.

The proposal comprises a new Motorway Rest Area (MRA) including up to 241 car spaces, 63 HGV spaces, 6 coach spaces and caravan parking with new site access via a purpose-built roundabout on the B4005. Internal pedestrian routes are indicated with a new footway/cycle link proposed on the B4005. EV charging infrastructure will also be provided with all spaces EV-ready and 50 rapid charging spaces will be available immediately on opening. The site will be future proofed to ensure the infrastructure is available for GHV electrical charging too when technology and power generation allow. On-site fuel filling stations (car and HGV) will be provided within a separate fuel filling station with the potential to upgrade to biofuel in the future.

Vehicular access to the Motorway Rest Area (MRA) would be provided via a new 4-arm, 55m roundabout off the B4005. Submitted plans show 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, National Highways concur that the requirements of Circular 01/2022 would be met. The additional works to the roundabout outside the redline, but wholly contained within the adopted highway can be secured through a section 106 and through a related Grampian condition.



Figure 23: Proposed access shown on the illustrative masterplan

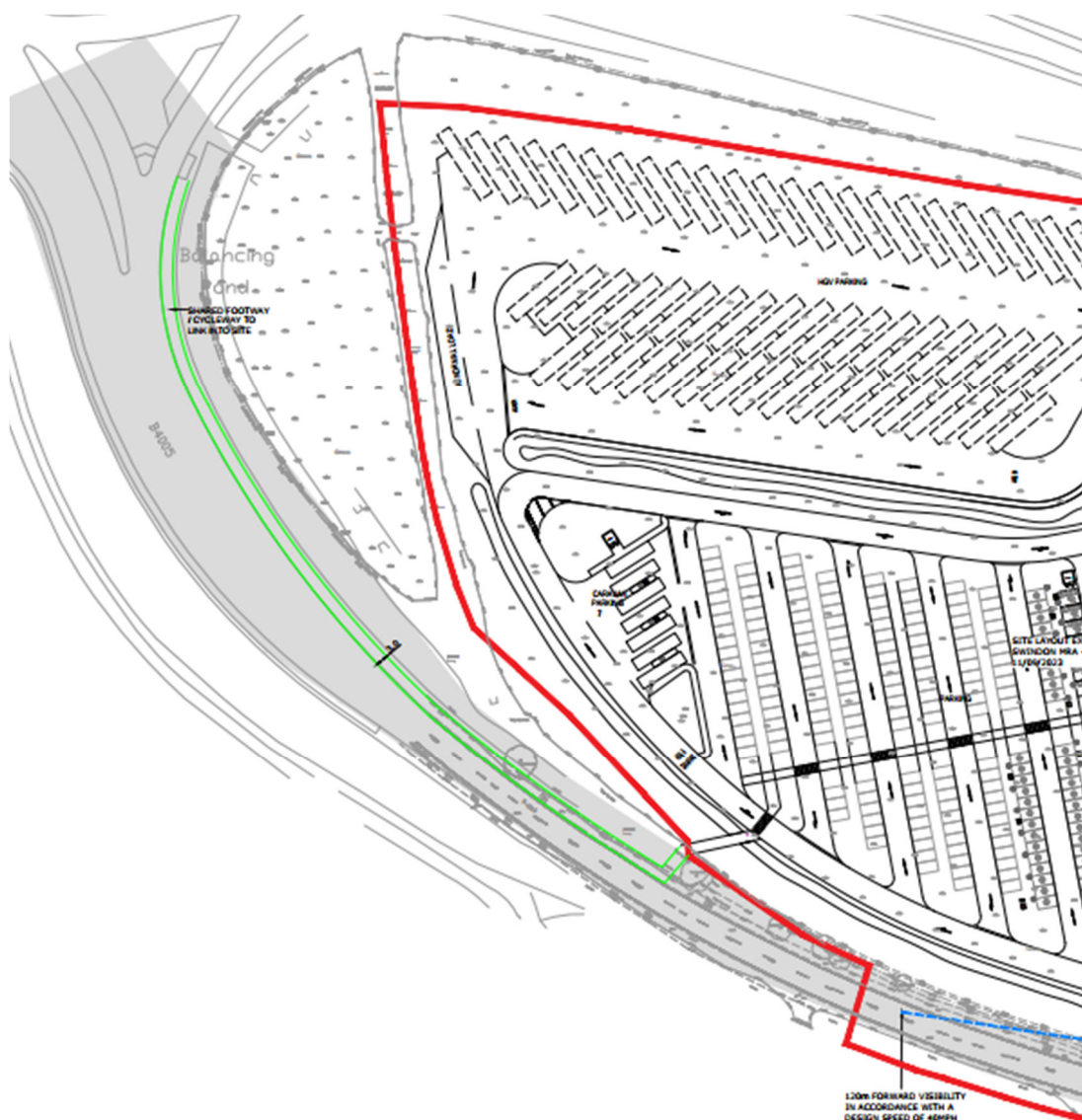


Figure 24: Proposed Footway and cycle link Ref 3728-F06 Rev C

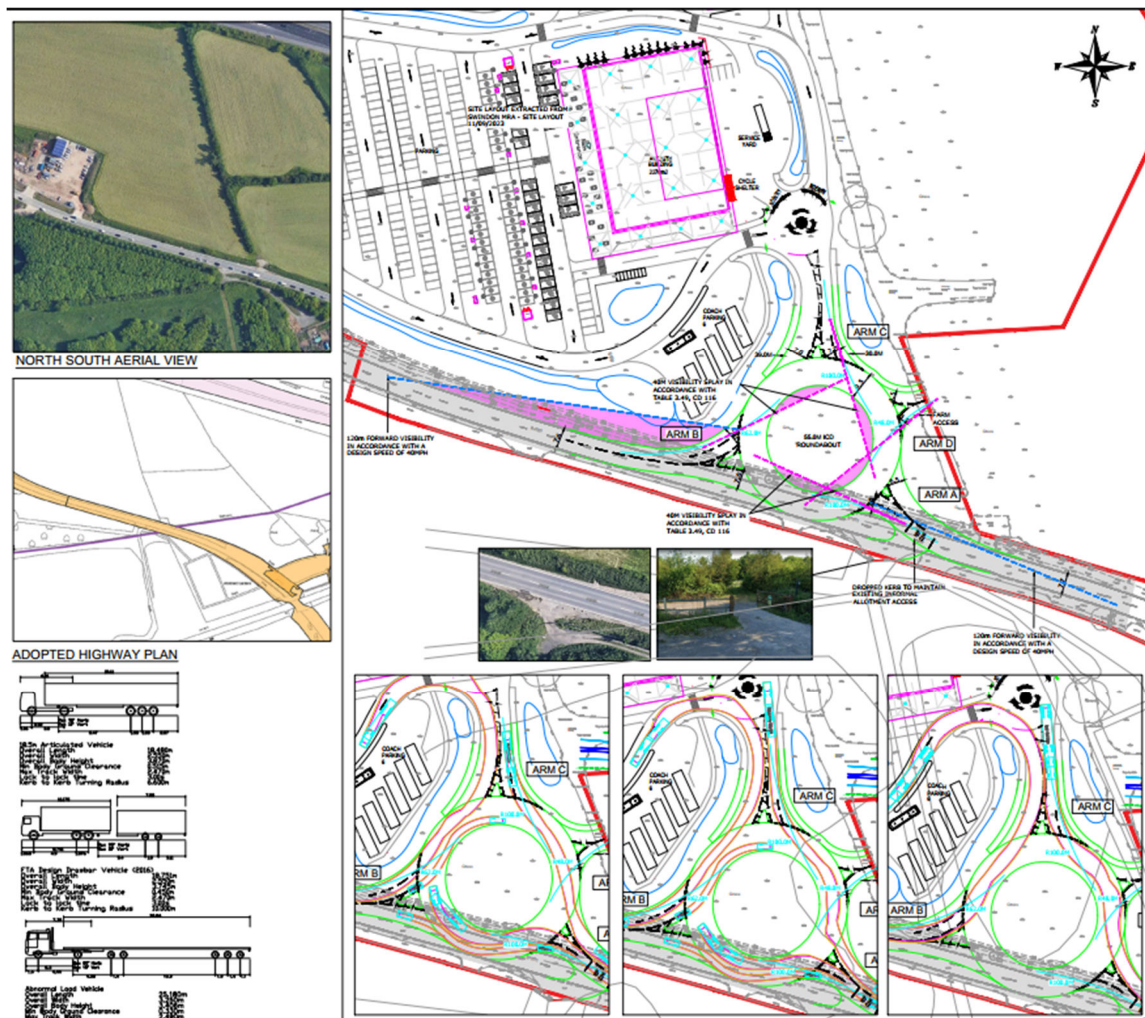


Figure 25: Proposed site Access plan ref 3728-F04 Rev I

The proposed roundabout design accords with DMRB standards and has been subjected to a Road Safety Audit (RSA), which identifies no fundamental issues preventing the safe operation of the access subject to delivery of recommended mitigation measures. These measures include adjustments to roundabout geometry, visibility controls, lighting provision, and relocation of the existing agricultural access, further back in the site to ensure highway safety of users of the roundabout. The roundabout has been designed to accommodate all vehicle classes, including HGVs associated with the proposed service area.

The illustrative application site layout 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. 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 recommending a planning condition to ensure that the adjacent land remains for biodiversity purposes ancillary to the MRA only and for no other use. It is considered that a condition to this effect would meet the tests required by the NPPF and it recommended to be attached in the grant of any permission.

Active Travel and Sustainable Access

In terms of sustainability, the proposed development by its nature is likely to attract motorised vehicles with less desirability or need to accommodate significant increase in pedestrians and cyclists given its main purpose is to serve those already using the M4 motorway. In this regard it is not likely to increase the use of private motor vehicles as it is simply serving the existing users of the motorway.

A number of PRoWs can be accessed from the A3102. In turn, these footpaths provide links to Royal Wootton Bassett and to Swindon. It should be noted that there are no PRoWs on the site itself. That said, the proposal could be made more accessible for employees by public transport, walking, and cycling, and proposed provisions for sustainable access are intended to be integrated with the existing established development in the locality.

The site benefits from access to regular bus services operating from stops located on the A3102 Swindon Road, immediately west of the development. These stops provide frequent services throughout the day to destinations including Swindon, Chippenham and Royal Wootton Bassett, with operating hours typically between 04:45 and 23:45, offering a practical alternative to car travel for staff commuting.

Swindon Railway Station is also accessible, being reachable via a 15-minute bus journey on Service 55 or a 26-minute cycle. The station provides frequent services—approximately 13 trains per hour—to major destinations such as London and Swansea, further supporting multi-modal travel opportunities. Overall, the site is considered to be accessible by sustainable public transport for local employees, with realistic opportunities for both bus and rail-based commuting.

The proposals include a shared footway/cycleway link to the B4005, with the opportunity to connect into a new footway on the site's southern boundary. Internal circulation provides safe pedestrian routes between parking areas, the amenity building and fuel filling station. Cycle parking and staff facilities (showers, lockers and changing provision) are incorporated to promote sustainable travel for employees.

A Staff Travel Plan accompanies the application, targeting reduced single-occupancy car travel (5% shift within 3 years) and promoting car-sharing, public transport use and electric vehicle (EV) mode share. EV charging infrastructure is integrated, with all parking spaces future-proofed to be EV-ready. This would be secured through conditions and a s106.

Traffic Generation and Highway Network Impact

The TA identifies robust trip rates using comparable M4 motorway service areas. Resulting peak hour movements are forecast to be:

- AM Peak: 251 arrivals / 251 departures (191 cars, 60 HGVs)
- PM Peak: 330 arrivals / 330 departures (251 cars, 79 HGVs)

Only 7% of all trips are expected to route via the local highway network, with 93% entering/exiting directly from the M4.

Junction Capacity Assessments

In terms of the B4005/Site Access Roundabout, operational analysis confirms all arms would operate within capacity ($RFC \leq 0.90$, queue lengths ≤ 9 vehicles) in 2033 with-development including the emerging Local Plan scenario.

In terms of the M4 Junction 16, this has been modelled using VISSIM microsimulation. National Highways-accepted modelling shows negligible increases in delay (AM +5–6 sec; PM –8–9 sec) with no adverse impact on the M4 mainline or slip roads. Queues remain within available storage lengths under all future year scenarios (2027 and 2038).

Highway Safety

Collision data for the local network shows no pattern of highway deficiencies likely to be exacerbated by the development. In particular at J16, 11 collisions occurred between 2017–2021 (10 slight; 1 serious), with no identifiable infrastructure-related issues. There are no recorded collisions on the B4005 in the vicinity of the proposed site access. It is acknowledged that representations have been received raising significant concern about HGVs using Marlborough Road/Brimble Hill to the east of Wroughton approximately 5k from the proposed motorway rest area site. Photographs, images and written accounts have been submitted stating that this road is not suitable for HGV traffic. While these concerns are fully appreciated, no evidence has been provided as part of this application to indicate that the proposed

development would generate a material increase in HGV movements along this particular route.

This conclusion is reinforced by the separation distance between the site access and Brimble Hill, and more importantly, by the fact that the development is designed to serve users of the Strategic Road Network at the M4 and to encourage HGVs away from using the local highway network where it can be avoided. It is therefore considered unlikely, taking into account all reasonable scenarios, that the proposed Motorway Rest Area would result in a significant increase in HGVs using this road on the far side of the settlement.

The impact of the proposal on the existing access to the allotments opposite the site on the B4005 was raised as a concern in the representations and noted in the RSA. The subsequent designer's response on behalf of the applicant demonstrated that appropriate visibility is achievable from the allotment access.

It is understood that the applicant met with the allotment owners to give them comfort over the proposals. To address these concerns, the applicant's transport consultants discussed the proposals with them and made some small changes to the allotment access radii and added 'keep clear' road markings to prevent any potential queuing from blocking the site access.

Consequently, the proposals are likely to improve the vehicular access to the allotments as the proposals reduce traffic speeds on approach and provide an increased 'off carriageway' hard standing area for allotment users to wait whilst entering / exiting the allotment site.

In terms of the RSA, the applicant has accepted all recommendations arising from it and committed to implementation at detailed design stage and through reserved matters. All of which can be secured by condition and through the s.106. This would ensure there would not be an unacceptable impact on highway safety for the local road network and the residual cumulative impacts on the local road network following mitigation would not be severe taking into account all reasonable future scenarios.

Wiltshire Council's Highways Officer and Strategic Transport Specialist, as well as National Highways, raise no objection, subject to planning conditions (and a sealed legal agreement) and consider the proposed roundabout and new access points to serve the proposed development to be acceptable when tested against the NPPF and local plan policy and highway standards.

National Highways

National Highways has been an important consultee throughout the assessment of this application. Extensive work and detailed discussions have been ongoing. National Highways primary consideration is for the ongoing safe and efficient operation of the M4 and J16. 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 supportive of proposals that increase and improve facilities for both freight and EV charging, which the proposed development will deliver. Further National Highways is supportive of proposals which increase roadside facilities for HGV drivers and the freight sector and they note that a number of distribution and warehousing developments have come forward along the M4 and A419 corridors increasing 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. An informative is recommended to be included on any grant of permission to remind the applicant that motorway signage is subject to a separate application process directly with National Highways.

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.

Assessment of Traffic Impact and Mitigation

The proposed development has been assessed in a Vissim microsimulation model previously developed on behalf of National Highways. Extensive work has been undertaken in close discussion with National Highways for the scheme. National Highways has therefore been frequently updated and consulted on every aspect of the planning application and site evolution. National Highways make the following observations as part of their final consultation response:

“The [Vissim] 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 [the applicant’s transport consultants] 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.

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

Table 2: Adopted MRA trip generation (from National Highways consultation response)

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”.

Accordingly subject to an appropriate s106 and conditions as set out above the proposed development is considered to meet local and national policy requirements for highway safety of the SRN and immediate locality in this regard. National Highways are content that the proposed development would not have an unacceptable impact on highway safety and would not result in a residual cumulative impact on the road network following mitigation that would be severe taking into account or reasonable future scenarios.

Parking Facilities

The proposal would provide up to 241 car spaces, 63 HGV spaces, 6 coach spaces and caravan parking. Parking would be a reserved matter, but it goes to the heart of the principle in this case so has been assessed in detail.

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.

Whilst it is appreciated that the proposed site is located outside settlement limits, its proximity to the existing

J16 and M4 make it the optimal location for the proposal. The LPA has worked closely with highways officers, the Wiltshire Council Strategic Transport Specialist and National Highways officers throughout the assessment of this application.

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. It is 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.

The Council's Strategic Transport Specialist has suggested a number of s106 contributions to secure the additional works required to J16, the roundabout and the upgrading of the B4005 as well as towards pedestrian and cycle route improvements and public right of ways improvements.

The proposals have been assessed against Wiltshire Core Strategy policies CP60–CP66 and the National Planning Policy Framework (NPPF). The development meets CP60 by promoting sustainable travel through EV provision, walking and cycling links, and an active Travel Plan for future staff. The proposal also provides safe, suitable and policy-compliant access for all users in accordance with CP61 and the NPPF paragraph 110. The proposal demonstrates limited traffic impact and secures travel demand mitigation aligning with CP62 of the WCS. The development would also contribute positively to climate-conscious transport objectives through the provision of much needed EV infrastructure. It provides sufficient parking and where possible minimises the impact on air quality and noise impact – subject to detailed conditions. The proposal supports the strategic movement of goods, reducing inappropriate HGV lay-by parking meeting CP65 and ensures no material harm to the Strategic Road Network (SRN), with National Highways endorsing the modelling methodology and outcomes as required by CP66 of the WCS and the NPPF paragraph 111. The proposed site access can be delivered safely and in accordance with national design standards.

Accordingly, subject to the recommended conditions and planning obligations, the proposal has demonstrated that there would not be an unacceptable impact on Highway safety and that the residual cumulative impacts on the road network following mitigation would not be severe taking into account all reasonable future scenarios. Consequently, there are no substantive highway reasons to refuse the application on the basis that there would be no unacceptable highway impacts on highway safety or severe residual cumulative road network impacts (following mitigation).

9.14 Heritage Impacts:

Built Form: Where applicable, the NPPF requires that 'great weight' should be given to the conservation of heritage assets and advises that a balanced approach with the public benefits which may result from proposals being weighed against any harm caused. NPPF Paragraph 207 advises that *"where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation"*.

Core Policy 57 of the adopted WCS not only requires a *"high standard of design"* criterion iv requires new development to be *"sympathetic to and conserve[e] historic buildings and historic landscapes"*. CP58 of the adopted WCS similarly sets that the new development *"should protect, conserve and where possible enhance the historic environment"* and that designated heritage assets and their settings should be *"conserved, and where appropriate enhanced in a manner appropriate to their significance"*.

The closest designated heritage asset is Upper Studley Farm (Grade II listed) some 3.1km to the south west. It is considered that the proposal would have no impact on the built form of the asset and given the separation distance and the existing built form and surrounding infrastructure, would have a negligible impact on the setting of this listed building. The Conservation officer has raised no objection and no comment in consultation and accordingly there would be no harm in this regard thereby meeting criteria of CP58 of the WCS and the NPPF Section 16.

Archaeology: NPPF Paragraph 207 advises that “*where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation*”.

A Heritage and Archaeology Assessment (including the results of a geophysical survey) has been submitted in support of this application. The identification of potential archaeological features through geophysical survey was considered insufficient archaeological mitigation and the Council's archaeologist required the results of the geophysical survey were "ground-truthed" by means of an archaeological trial trench evaluation undertaken prior to determination of this planning application.

A trial trench evaluation was conducted and the Archaeological Evaluation report (Archaeological Evaluation by Cotswold Archaeology dated April 2024) submitted. This report demonstrated that there was reasonable correlation between identified archaeological features and anomalies recorded by the geophysical survey. The majority of the geophysical anomalies were found to relate to ridge and furrow cultivation, and it is probable that the limited number of archaeological features identified during the evaluation relate to the post-medieval agricultural use of the site.

No evidence for prehistoric or Roman activity was identified during the evaluation, suggesting that the Roman activity recorded nearby does not extend into the current site. The evidence of ploughed-out ridge and furrow cultivation encountered throughout the excavated trenches suggests an agricultural character to the site from at least the medieval period. The identified furrows correlated well with the geophysical survey results, and post-medieval to modern material was recovered from a furrow in Trench 6.

The archaeological evaluation identified a limited number of archaeological features, supporting the results of a preceding geophysical survey. The identified features are all likely to be post-medieval or later date, and related to agricultural practices within the area. As such, further archaeological mitigation is not deemed necessary. The report has been reviewed in detail by the Council's archaeologist who has confirmed that no further archaeological work is required and no conditions are necessary. Accordingly, the proposed development would not result in harm to any buried assets or archaeological features of material importance and therefore the proposed development is acceptable in this regard.

9.15 Neighbouring Amenity and Amenity of Future Occupiers: WCS Policy CP57 sets out within criteria vii for development to have “*regard to the compatibility of adjoining buildings and uses, the impact on the amenities of existing occupants, and ensuring that appropriate levels of amenity are achievable within the development itself, including the consideration of privacy, overshadowing, vibration, and pollution (e.g. light intrusion, noise, smoke, fumes, effluent, waste or litter)*”.

NPPF paragraph 135 Criterion f) meanwhile requires the creation of “*places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users*”.

The nearest occupiers are those based at the Hay Lane Gypsy and Traveller site some 200m to the east of the site. There are also residential occupiers at Spittleborough Cottages some 260m to the west (the other side of Junction 16) as well as residential occupiers at Upper Studley Farm some 311m to the southwest. The majority of these occupiers are at sufficient distance such that it is concluded that the proposed development would not result in a loss of privacy, overbearing impact, loss of light, pollution or overlooking to the occupiers of these properties.

The nearest occupiers are those at the Hay Lane Traveller Site to the east. Given the proximity of the site to the proposed development site it is important to assess the impact of the proposal on the amenity and local environment of the occupiers of the adjacent Gypsy Traveller site at Hay Lane.

CP47 of the WCS (Meeting the Needs of Gypsies and Travellers) is only focused on proposals for the gypsy and traveller pitches or travelling showpeople plots and yards it does not give any specific

requirements or details in relation to developments that are intended adjacent to gypsy traveller sites.

The draft Wiltshire Council Gypsies and Travellers Development Plan Document pre-submission draft (Reg 19) August 2024 sets out Wiltshire Council's strategic planning policies for meeting the accommodation needs of gypsies and travellers and travelling showpeople. It will replace 'Core Policy 47. Like CP47 it does not give any specific requirements or details in relation to decision making for proposed developments adjacent to gypsy traveller sites and is therefore of limited weight in this current assessment.

The Government's Planning Policy for Traveller Sites (December 2024) is also predominantly written with development proposals for new gypsy traveller sites in mind. Notwithstanding this the introduction is quite clear that the government's overarching aim is to "ensure fair and equal treatment for travellers in a way that facilitates the traditional nomadic way of life of travellers while respecting the interests of the settled community". It also requires that local planning authorities have "due regard to the protection of local amenity and the local environment" in relation to Gypsy Traveller sites.

Article 8 of the European Convention on Human Rights as enshrined in the Human Rights Act in 1998 concerns a right to respect private and family life. The Public Sector Equality Duty was introduced under the Equality Act 2010 which requires at section 149 that a public authority or person exercising a public function must amongst other requirements foster good relations between persons who share a relevant protected characteristic and persons who do not share it. This includes Gypsies and Travellers, and others who adopt a nomadic way of life, which is an integral part of gypsy and traveller culture.

The Hay Lane Traveller site is an established site situated approximately 200 metres to the east of the proposed development site within Swindon Council jurisdiction. Directly to the north of both the application site and the Hay Lane Traveller site is the M4, with Junction 16 some 350 m to the northwest which already generates significant noise. North of the M4 (and the traveller site) is a large industrial area part of the urban area of Swindon comprising of a number of large warehouses in industrial employment use.

Representations have been made raising concern regarding the impact of the proposal on the Hay Lane site and those using it and have urged the LPA to have regard to the Human Rights Act and the Equality Act. This has been done through the course of this planning assessment.

Evidence has been submitted by the applicant in the form of air quality, lighting and noise assessments, which indicate that the proposed development would not give rise to significant material harm in terms of noise, light or air pollution

Lighting

The application is supported by an Exterior Lighting Survey, Design & Calculation Report, (by SKR Lighting Design). The report analyses the existing light levels at the Site through desktop and primary surveys. Desktop surveys demonstrate that existing light levels experienced at the site are between 8 and 32 NanoWatts/cm²/sr, classifying the area as a 'brighter' location and a suburban location, in terms of light levels.

The lighting scheme indicates 'warm' lighting specifications with site orientated columns to minimise the spill of light pollution. Indeed, this lighting scheme has been developed to ensure that the scheme mitigates its impact on the wider area to reduce the light spill. Much of the scheme has been fitted with dusk to dawn sensors that will automatically control when the lights are on improving the energy efficiency, site security and maintaining highway safety. This confirms that the proposed lighting can be designed in such a way so not to result in material harm to nearby occupiers or road users.

Whilst specific details of design are reserved for assessment at a later stage, an indicative lighting specification has been prepared and can be conditioned as a form of lighting parameter plan in the event approval is recommended. Details of the final lighting scheme along with written confirmation from an ILP approved lighting engineer confirming it accords with light levels of environmental zone E2

or better is required to be submitted and approved by the LPA at the time of reserved matters submission and this is recommended to be secured by a condition.

Air Quality

Core Policy 55 of the WCS states that proposals must demonstrate that measures of mitigation have been effectively undertaken to protect public health, environmental quality and amenity in relation to the quality of air. These measures should demonstrate how positive contributions will be made to the aims of the Air Quality Strategy for Wiltshire and Wiltshire Air Quality Action Plan, when necessary.

The applicants instructed Cass Allen to conduct detailed surveys of the existing air quality levels and recommend the mitigation measures to ensure that unacceptable harm to air quality would not arise as part of development. This is set out at Chapter 9, Figure 1 and Appendices 7.1 to 7.6 of the Environmental Statement submitted with the application with recommended mitigation measures listed in Appendix 7.3.

During the construction phase, the anticipated impacts of construction phase were found not to be significant. Regarding the operational phase of the development, the assessment determined that the impact to all existing receptors would be negligible and that the impacts of the development were not significant.

It is noted by the public protection officer that the Air Quality Impact Assessment modelled the impact of levels of NO₂ PM_{2.5} and PM₁₀ on all residences and occupiers close to the proposed site and concluded that the impact is negligible. The mitigation measures proposed for dust as set out in 7.3 of the Cass Allen appendices are considered suitable.

A condition is recommended to secure the details of commercial kitchen ventilation and extraction equipment including the design and appearance of any required flues to ensure appropriate amenity levels are maintained.

As such subject to conditioning the mitigation measures set out, it is considered that the proposed development would be acceptable in terms of air quality impact on the amenity of nearby occupiers.

Contamination

The site comprises green field agricultural land that has not been used previously and as such is unlikely to have any land contamination issues especially given that the proposed development is a less vulnerable use. The Environmental Health officers have not raised any issue of land contamination and have raised no objection in this regard.

Noise

Core Policy 57 seeks to ensure that all developments are designed to a high quality and respect the amenity of neighbouring developments, this includes protection from unacceptable levels of noise and vibration. An assessment of the potential impacts from the proposed development has been submitted with the planning application at Chapter 6 of the Environmental Statement.

The applicant conducted an initial noise survey on the 9th and 11th of August 2023 to establish the baseline noise level and background noise levels at potentially noise sensitive locations nearby. The survey confirms that the main source is the M4 and B4005 road.

The applicants state that road traffic noise is anticipated to increase, with or without development, due to increased road traffic. These changes are however set to lead to no overall change in noise impacts.

To ensure that amenity to the Travellers' Site on Hay Lane is not adversely impacted, eastern areas of the Site have omitted any noise generating uses. Further noise mitigation will be included as part of the detailed design of development and can be secured by condition.

The Noise Assessment established the baseline noise levels across the site. The report concludes that

there would be a negligible noise impact on existing nearby residential occupiers of dwellings and pitches situated close to the site. Wiltshire Council's Public Protection Department were consulted on this application.

The Wiltshire Council Public Protection Acoustic Specialist Officer has reviewed the noise section of Environmental Statement Volume 1 and requests a condition is applied that requires an assessment of acoustic impact from fixed plant and onsite vehicle movements that demonstrates noise from these sources, when assessed in accordance with BS4142, against the background, meets a target of 5dB below background. Given the relatively high background noise levels and distances involved (350m to Hay Lane site from any noise generating sources) this target should be readily achievable, and the proposed condition has not been disputed by the applicant. If noise from the service station is 5dB below the background during the daytime and at night then it doesn't matter what the construction of the dwellings/mobile homes/caravans is, noise from the service station will not be measurable or discernible against the background noise level inside or outside of the dwellings. Noise from the M4 and other roads will continue to be the dominant noise source.

The Hay Lane Travellers site is in Swindon District Council and officers have discussed this matter with the Environmental Protection Team Leader who agrees with the stance Wiltshire Council has taken of conditioning noise control and the 5dB below background target.

The existing noise associated with the M4 in combination with the noise generated from the large industrial units to the north, mean that in terms of the noise assessment light and air quality the proposed development would not materially increase the levels of noise or reduced the air quality compared to what currently exists for the people occupying the Hay Lane gypsy traveller site.

The amenity and local environment of the existing occupiers of the established Hay Lane Traveller site have been carefully considered and assessed in this planning assessment. It is concluded that the proposed development would not give rise to material harm to or a detrimental impact on the local amenity or local environment currently afforded to those occupiers.

The proposed development will also require a Construction and Environmental Management Plan, with Traffic Management Plan to be submitted prior to commencement to ensure that the proposed development will not have detrimental impacts on the amenities of nearby occupiers or the environment. This is recommended to be secured through condition.

Accordingly, it is considered that subject to the conditions set out above, the proposed development is acceptable in terms of its impact on the local amenity and local environment of the adjacent of the occupiers of the adjacent established Gypsy Traveller Site at Hay Lane. This assessment is in accordance with Article 8 of the ECHR Human Rights Act 1998 and the Council has paid regard to its public sector equality duty under section 149 of the Equality Act 2010. The case officer has had regard to the rights of the adjacent occupiers under Article 8 of the ECHR as incorporated into the Human Rights Act 1998.

9.16 Ecology Matters: WCS CP50 requires development proposals to *“demonstrate how they protect features of nature conservation and geological value as part of the design rationale”* and requires all proposals to *“incorporate appropriate measures to avoid and reduce disturbance of sensitive wildlife species and habitats throughout the lifetime of the development”*.

Improving biodiversity is enshrined within the environmental objective contained within paragraph 8c of the NPPF for achieving sustainable development. The NPPF also requires net gain for biodiversity to be provided including by *“establishing coherent ecological networks that are more resilient to current and future pressures”* as set out within paragraph 187d.

This outline application has been submitted with an Ecology Assessment which is within the Environmental Statement (784-B48803, dated October 2023 by Tetra Tech), Biodiversity Impact Assessment (dated September 2023 by Ecology By Design), an Ecological Parameters Plan (Ref LA5731 001. Dated June 2024, by IP Architecture), a Biodiversity Impact Assessment (dated May 2024.

The *Proposed Layout Plan* identifies areas of the site which are unconstrained, areas where sensitive design or restrictions may be required, and areas of the site which are to be retained, remain undeveloped, enhanced, form part of the landscaping for the purposes of protecting and enhancing biodiversity and areas to be used as compensatory habitat in line with the submitted ecology documents, including the Biodiversity Net Gain Calculator spreadsheet. This will become an 'approved document' secured by condition of any outline permission granted and any reserved matters application must be in compliance with the plan.

The proposed biodiversity mitigation field on the east of the site is welcomed. The RLB is this area cuts across the field in the south-eastern corner and does not follow the hedge line. Consequentially, the proposed parameter plan includes a treelined hedgerow to clearly delineate it from the rest of the site. linear feature such as but not limited to a hedgerow or line of individual trees to clearly show this boundary.

Protected Species/Habitats

The application included an Ecological Impact Assessment that identified a mosaic of habitat types on site including priority habitat of native hedgerow, together with modified and neutral grassland. A number of ponds and wet ditches also exist outside but adjacent of the site boundary.

Great Crested Newts

A number of ponds were noted in close proximity to the site together with existing records for GCN. Habitat suitability Index Surveys together with eDNA surveys were undertaken for the existing ponds in close proximity to the site. Evidence of GCN were identified in pond two and although pond one returned a negative result, it is considered likely that GCN also utilise this area due to the close proximity. Although the ponds will not be directly impacted by the proposals, the site supports suitable habitat that could be utilised by GCN during their terrestrial phase.

The applicant has submitted a District Level Licence from NE and it has been provided along with confirmation of Natural England's agreement and as such this is acceptable instead of carrying out site specific mitigation and compensation.

Bats

Bat transect surveys and static detector surveys undertaken in 2023 identified at least 9 species foraging and commuting along the boundaries of the site. Bats recorded included common and soprano pipistrelle, brown long eared bat and lesser horseshoe bat, an Annex II species. The results noted that a transitional soprano pipistrelle roost lies within close proximity to the eastern hedge due to the timings of calls in relation to sunrise and sunset during the September surveys. However, no roosting evidence on site was identified.

Ground level preliminary roost assessments of two trees were undertaken to identify potential roosting features for bats which then led to emergence surveys for one tree. No roosting sites were identified and the boundary features present on site are anticipated to be retained excepting a section of hedgerow one which will be removed for access.

The lighting plan submitted in support of the proposal is welcome and it is noted that the scheme design has considered biodiversity. The results of the bat surveys together with the proposals for no net loss highlight the importance of retaining the eastern section of the site as dark. Ensuring the lighting along this boundary feature is reduced as far as possible will be crucial to ensuring the retention of dark foraging and commuting routes for bats particularly as the enhancements on site are likely to encourage an increase of biodiversity in this area. Further reductions in light spill along the eastern boundary would be welcomed and this is recommended to be conditioned.

Reptiles

Surveys undertaken identified small populations of slow worm and grass snake on site. Construction impacts are anticipated, however an enhanced reptile refugia area in the eastern parcel is proposed. A mitigation strategy to ensure construction and operational impacts are minimised is required however, this is recommended to be secured via condition in the form of a Construction Environmental Management

Plan.

Birds

Bird surveys undertaken identified overwintering use by a number of species of note as well as farmland breeding bird assemblages during the summer activity surveys. Construction and operational impacts are therefore anticipated. It is noted that the boundary features suitable to support a number of these species will be retained together with the eastern land parcel which will be enhanced to support species such as skylark and fieldfare. Mitigation strategies for overwintering and breeding birds will be required for both construction and operation, however this could be secured by condition through the construction management plan and the LEMP to be submitted with the detailed design proposals.

Additional enhancement measures for biodiversity have been proposed to include bird and bat boxes within the eastern parcel which are welcomed. These should also be secured by condition.

Dormice

As stated previously, the report scopes out dormice. However, records of dormice exist in the adjacent woodland. We note that the boundary features suitable to support this species on site are largely being retained, however the removal of sections of hedgerow 1 for access will require consideration. The conditioned CEMP will need to include measures to minimise impacts on this species within the zone of influence during the construction phase.

Biodiversity No Net loss

This application was submitted prior to Biodiversity Net Gain (BNG) becoming mandatory on 12th February 2024, therefore BNG *per se* is not obligatory. However, Core Policy 50 of the Wiltshire Core Strategy requires all development to demonstrate no net loss of biodiversity and to seek opportunities to enhance biodiversity. The NPPF also encourages applications to deliver measurable net gains (para 193d).

The submitted information (The Biodiversity Metric 4 March 2024. Ecology By Design) demonstrates that the development will not result in a net loss of local biodiversity resource. The proposal will result in a 16.6% biodiversity net gain and an increase in hedgerow units of 13.3%. The boundary hedgerows (priority habitat) are part of a scattered tree network that are to be retained as part of the proposal which is welcomed. They currently provide functionally linked habitat to the wider hedgerow and priority deciduous woodland immediately to the south. These proposals are secured through the Ecology Parameters Plan and the detail will be secured through a proposed LEMP condition.

Accordingly, it is considered that subject to the requisite ecology safeguards being imposed by way of planning conditions no ecology-based objection is raised and the proposed development meets requirements of the Habitat Regulations, exceeds Policy CP50 of the WCS as well as exceeds the biodiversity net gain requirements and meets the relevant provisions of the NPPF.

9.17 Other Matters: Procedural and Consultation Concerns: Representations have raised queries about:

- the ownership of the land;
- the accuracy of the ownership certificate accompanying the application,
- lack of site notice,
- lack of appropriate consultation to specific residences including the Hay Lane Traveller Site and Biffa
- infringement of legislation protecting the rights of Gypsy Travellers.

These matters are considered below:

Ownership of the Land and Accuracy of the Ownership Certificate Accompanying the Application

Questions and queries relating to the ownership of the land have been raised through the consultation process. The application form confirms that relevant landowners have been formally notified in

accordance with the required legislation. Officers are satisfied in absence of any evidence to the contrary that this is acceptable.

Lack of Site Notice and Lack of Appropriate Consultation with Specific Residences including The Hay Lane Traveller Site and Biffa

The application has been consulted formally three times, with site notices produced each time. The last site notice was issued 10 November 2025 and erected at the site. Notice *was also included in* the local press (Wiltshire Gazette) and neighbouring occupiers notified in accordance with requirements of the legislation.

Legislation Protecting the Rights of Gypsy Travellers

The rights of the occupants of the Hay Lane Traveller Site have been dutifully considered as part of this planning application and assessment. This assessment is in accordance with Article 8 of the ECHR Human Rights Act 1998 and the Council has paid regard to its public sector equality duty under section 149 of the Equality Act 2010. The case officer has had regard to the rights of the adjacent occupiers under Article 8 of the ECHR as incorporated into the Human Rights Act 1998.

10. Developer Obligations: WCS Core Policy 3 states that all new development is required “to provide for necessary on-site and, where appropriate, off-site infrastructure requirements arising from the proposal” which would be delivered directly by the developer and/or through a financial contribution.

The infrastructure requirements identified in the Highways section and reiterated below relevant to the application site and are required to mitigate the impact of the proposed scheme on Junction 16 and the surrounding road network, in line with the tests set under Paragraph 58 of the NPPF. These are:

- a) *necessary to make the development acceptable in planning terms.*
- b) *directly related to the development; and*
- c) *fairly and reasonably related in scale and kind to the development.*

The following s106 requirements have been identified and have been agreed in writing with the applicant as being CIL regulation compliant (i.e. being reasonable, necessary and directly related to the development) in the event that this outline application is considered acceptable when tested against the NPPF and local plan policy.

Highways: It is necessary to ensure the proposed development would provide safe, suitable and accessible movement from the site for all users to facilities, services and amenities and the following developer obligations are necessary.

To align with the approved preliminary scheme of works for the westbound off-slip set out within ‘Proposed M4 Westbound Off-slip Improvement Scheme’, drawing number 3728- F13 Rev H, prepared by Eddisons and dated July 2025 the following items are required to be secured in the s106:

- westbound off-slip will be widened to provide an additional lane marked for onward travel to the MRA and B4005
- yellow-box markings also introduced at the junction with the roundabout circulatory (specify which junction).
- change in lane designation on the M4 eastbound off-slip with lane 3 of the slip road remarked for the B4005 only

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.

The development will also require an access roundabout junction and associated works on the B4005 including a review (including core sampling where necessary) and confirmation of the current standard and upgrading where necessary. These works are wholly within the local highway network and will be required to be delivered as an early phase of the development.

Public Rights of Way Improvements:

£3,500 towards improvements on the section of LTRE6 to the west of the proposed development because this path will see an increase in use as motorists stop for a break and dog walks through the existing allotments. The money would be spent on surface improvements and Access furniture upgrades.

S106 Monitoring Fee: A s106 monitoring fee would be required to be included within the s106 Legal Agreement, which would be **capped at £1,000**.

A S278 agreement is also required in conjunction with the s.106 and will include a requirement for signing alterations (including lane allocations 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.

CIL: No CIL is payable for this development.

11. PLANNING BALANCE & CONCLUSION

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires decisions to be made in accordance with the development plan unless material considerations indicate otherwise. In this case, the proposal is an outline application for a new Motorway Rest Area (MRA) adjacent to M4 Junction 16, including HGV parking, car parking, coach and caravan parking, EV charging, amenity building, fuel filling station, new access roundabout from the B4005 and associated works. The site lies outside defined settlement limits and is not allocated for development therefore not according with CP1 and CP2 of the WCS but meets exception criteria contained in policy 4.25 of the WCS of CP2 by virtue that it meets CP48, as well as CP65 and CP66 of the WCS. The proposed development is therefore in accordance with the development plan in principle. The benefits of this application are numerous but must be weighed against any harms identified. This planning balance is assessed and summarised below.

Benefits – Weight in Favour

1) Provision of HGV parking at Optimum Location – Very Significant Weight

There is a clear and pressing need for additional HGV parking provision and the proposal would deliver 63 HGV spaces with supporting welfare facilities and security measures (to be secured through condition for submission at reserved matters stage), directly addressing driver welfare and SRN safety objectives and would result in improvements to both. This is afforded **very significant weight**.

Further, the location is identified as sequentially optimal due to freight movement patterns in the area and the spacing relationship between existing services at Leigh Delamere and Membury. This benefit is afforded **significant weight** in the planning balance due to its direct relationship to SRN functioning, highway safety outcomes, CP65 of the WCS and national policy direction.

2) EV Charging Infrastructure and Decarbonisation Benefits – Very Significant Weight

A further benefit arises from the scale and future-proofing of EV infrastructure, including 50 active rapid chargers at opening with passive provision across remaining spaces and capability for future HGV electrification, aligning with national decarbonisation policy direction and local climate objectives. This would materially increase EV charging provision on this SRN corridor and is supported by Wiltshire Council's EV infrastructure team. This benefit attracts **very significant weight**.

3) Economic Benefits (Jobs and Investment) – Significant Weight

The proposal is a major investment (circa £30m) with a minimum of 150 new fulltime jobs on opening, alongside construction-phase employment and longer-term expenditure benefits. In line with the economic objective of the NPPF and relevant WCS objectives for a resilient economy, these benefits are afforded

significant weight.

4) Sustainability, High Quality Design and BREEAM Commitments – Significant Weight

The submitted approach includes a BREEAM “Excellent” commitment, green roofs and solar PV aspirations, and a “sustainability-first” design direction. While design is largely reserved at outline stage, conditions are proposed to secure the key principles and ensure sustainability commitments are delivered at reserved matters. It is considered that the scheme has potential to raise standards in this infrastructure sector. These benefits therefore attract **significant weight**.

5) Biodiversity Enhancements / Net Gain – Significant Weight

The proposal includes a substantial area to the east of the site reserved for biodiversity enhancement, with identified gain in biodiversity value and long-term management to be secured through conditions/LEMP and related obligations. The Council’s ecologist raises no objection subject to mitigation and the biodiversity enhancements attract **significant weight** given that this development is not required to provide any BNG under statutory legislation

6) Transport Mitigation and Wider Safety Benefits – Moderate Weight

In terms of highways, National Highways and the Council’s Strategic Transport Specialist raise no objection subject to mitigation and legal agreements/conditions. A package of works is identified as necessary to address impacts at Junction 16 (including the M4 westbound off-slip mitigation) and associated measures can be secured via s106/s278 mechanisms. While the mitigation works are required to make the development acceptable and are therefore not afforded significant weight, once delivered the mitigation works would provide a wider residual benefit to SRN/local road users. On this basis, this is afforded **moderate weight** as an additional benefit of the scheme.

7) PROW Improvements – Moderate Weight

£3,500 towards improvements on the section of LTRE6 to the west of the proposed development is proposed as it is considered this path will see an increase in use as motorists stop for a break and walk the dog. The money would be spent on surface improvements and Access furniture upgrades. This is afforded **moderate weight** as benefit of the scheme.

Neutral Weight

Mineral Safeguarding Area – Neutral (No Objection, No Sterilisation)

Neutral weight is attributed to the impact on the Mineral Safeguarding Area as the Mineral Resource Safeguarding Assessment concludes that no viable mineral resource would be sterilised by the development, subject to appropriate conditions. There is no harm but equally there is no benefit so this matter is treated as neutral in the planning balance (i.e., no residual harm).

Retail Impact – Neutral (No Harm Identified)

Neutral Weight is attributed to the retail impact because the retail aspect is ancillary to the main rest area use and the users of the retail would come from the SRN. The retail element proposed is an added option for those who would already be using the rest area for refuelling / charging and resting en route, therefore it is considered the proposal would not result in any harm to the existing vitality and viability of the existing town centre/village services.

Heritage (Designated / Built Form and Archaeology) – Neutral (No Harm Identified)

There are no designated heritage assets on site, and the report concludes the nearest listed building would experience no material harm to its setting given distance and context, with no objection raised. Archaeological evaluation and trial trenching confirm the site has no meaningful archaeological potential requiring mitigation, and the Council’s archaeologist confirms no further work is required. On this basis, heritage impacts are considered neutral in the planning balance.

Neighbouring Amenity (Including Gypsy & Traveller Site) – Neutral / No Material Harm (Subject to Conditions)

The nearest sensitive receptor is the established Hay Lane Gypsy & Traveller site, located approximately 200m east of the site (some 300m from the actual proposed built form) in Swindon's administrative area. It has been considered that the proposal would not give rise to material harm to living conditions or the amenity of the local environment in the current context of the proximity of the existing M4 and industrial units to the north. Due regard has been paid to Article 8 ECHR and the Council's Public Sector Equality Duty under section 149 of the Equality Act 2010, acknowledging the protected status of Gypsies and Travellers and the need to ensure fair and equal treatment.

Mitigation is secured through conditions (including lighting standards/bat-sensitive lux limits, noise control requirements including BS4142-type targets for plant/vehicle sources, and CEMP/CMP requirements). Given existing baseline influences (M4 and nearby industrial activity) and the separation distances from primary noise/light-generating elements, there would be no material harm to amenity for the Traveller site or other neighbouring occupiers. This is therefore treated as neutral (no material harm) in the overall balance, subject to the recommended conditions

Harms – Weight Against

1) Landscape / Countryside Effects – Limited Weight

The proposal would result in the development of a greenfield site and therefore some harm to landscape character. That said the effect would be localised especially given the current context of the site in proximity to motorway infrastructure which has already fractured the landscape in this location and capable of mitigation through detailed design, landscaping and boundary treatments secured at reserved matters. On that basis, this harm is afforded **limited weight**.

2) Loss of Agricultural Land – Limited Weight

The land is confirmed as Grade 3b (not Best and Most Versatile), but nonetheless represents a loss of agricultural land and countryside resource. This is **limited harm**, to be weighed against the benefits of the scheme.

3) Reliance on private motor vehicles – Limited Weight

The proposed development does not reduce nor encourage the reduction of high reliance on private motor vehicles due to it being a service rest area offering fuel filling and in this way the proposal conflicts with the core strategy and represents some harm. Conversely, the proposed development is also offering and encouraging EV charging and also is only going to be attracting those who are already using motor vehicles on the SRN rather than actively encouraging more. As such the harm is limited and is afforded **limited weight** in the planning balance.

Summary:

Impact / Consideration	Summary of Effect	Weight Applied
Need for HGV Parking	Critical national/local shortage; optimal freight location; meets Govt spacing criteria.	Very Significant Benefit
EV Rapid Charging Provision	50 rapid chargers; future-proofed; major SRN decarbonisation contribution.	Very Significant Benefit
Accessible SRN Location	Direct M4 J16 access; driver welfare and safety.	Very Significant Benefit
Economic Benefits	£30m investment; 150 jobs; local expenditure.	Significant Benefit
High-Quality Design & Sustainable Construction	BREEAM Excellent; green roofs; low-carbon design.	Significant Benefit
Biodiversity Net Gain Enhancements	16.6% BNG with 13.3% uplift in hedgerow quality; major ecological enhancement zone.	Significant Benefit
Highway Mitigation & Infrastructure Upgrades	J16 slip road improvements; roundabout and active travel upgrades.	Moderate Benefit
Public Rights of way improvements	Upgrades and improvements	Moderate Benefit
Public Rights of Way Enhancements	Toucan crossing; active travel links.	Moderate Benefit
Drainage Improvements	Greenfield run-off betterment; SuDS.	Moderate Benefit
Reliance on Private Motor Vehicles	Does not discourage the use of private motor vehicles; mitigated by EV charging; not increasing demand	Limited Harm
Loss of Agricultural Land	Loss of Grade 3b land	Limited Harm
Landscape Impact	Localised countryside change; mitigatable.	Limited Harm

Conclusion: When all matters are weighed, the proposal delivers a set of highly compelling benefits, most notably:

- addressing an evidenced shortfall in safe, secure HGV parking provision in an optimum location;
- delivering a major rapid EV charging hub aligned with decarbonisation objectives;
- generating significant job creation (150 new jobs) and investment (£30m);
- providing biodiversity enhancements (12.4% gain) and sustainability commitments (BREEAM Excellent); and
- achieving an acceptable highways outcome which benefits the wider road network subject to mitigation to be secured by legal agreement and conditions.

Key technical considerations including minerals safeguarding, heritage/archaeology, and neighbour amenity (including the adjacent Gypsy & Traveller site) are assessed as resulting in no material harm, subject to conditions. On balance therefore, the cumulative benefits demonstrably outweigh the identified harm. Accordingly, the recommendation is to grant outline permission, subject to completion of a Section 106 agreement and the recommended conditions outlined below.

RECOMMENDATION: To delegate to the head of Development Management to grant outline planning permission subject to the prior completion of a Section 106 legal agreement to cover

the contributions identified in Section 10 of this report, and subject to the following planning conditions set out below (as agreed with the applicants):

1. The development hereby permitted shall be begun either before the expiration of three years from the date of this permission, or before the expiration of two years from the date of approval of the last of the reserved matters to be approved, whichever is the later.

REASON: To comply with the provisions of Section 92 of the Town and Country Planning Act 1990 as amended by the Planning and Compulsory Purchase Act 2004.

2. No development shall commence on site until details of the following matters (in respect of which approval is expressly reserved) have been submitted to, and approved in writing by, the Local Planning Authority:

- a) The scale of the development.
- b) The layout of the development
- c) The external appearance of the development.
- d) The landscaping of the site (including any cut and fill / earthworks associated with the development)

The development shall be carried out in accordance with the approved details.

REASON: The application was made for outline planning permission and is granted to comply with the provisions of Section 92 of the Town and Country Planning Act 1990 and Article 3(1) of the Town and Country Planning (General Development Procedure) Order 1995.

3. The development hereby permitted shall be carried out in accordance with the following approved plans and documents:

- Site Location Plan Ref: M49_001 Rev E
- Existing Site Plan Ref: M49_002 Rev E
- Parameters Plan Ref: M49_110 Rev F 10 Nov 2025
- Illustrative Masterplan ref: 915-210 rev F 10 Nov 2025
- Proposed Layout Plan (Illustrative) ref: 915-201 Rev J
- Proposed Site Access Plan Ref: 3728-F04 Rev I dated 10 Nov 2025
- Ecology Parameters Plan Ref: LA5731-001 Rev B dated 10 Nov 2025
- Transport Assessment V4 revised 20 Nov 2025
- Proposed Footway Link ref. 3728-F06 rev.C
- Arboricultural Impact Assessment & Arboricultural Method Statement which incorporates the Tree Protection Plan dated 18th September 2023.

REASON: For the avoidance of doubt and in the interests of proper planning and for the protection, mitigation and enhancement of biodiversity.

4. No development shall commence until details of the proposed substations on site (including power, height, size, materials and landscaping) have been submitted to and approved in writing by the LPA. They shall be constructed in accordance with the approved details.

REASON: in the interests of visual amenity

5. For the avoidance of doubt, the subsequent reserved matters application(s) to be submitted pursuant to Condition 4 shall accord with the following plans:

- Parameters Plan Ref: M49_110 Rev F 10 Nov 2025
- Ecology Parameters Plan Ref: LA5731-001 Rev B dated 10 Nov 2025;

and shall be broadly in accordance with the following plans:

- Illustrative Masterplan ref: 915-210 rev F 10 Nov 2025 and
- Illustrative Proposed Layout Plan ref: 915-201 Rev J
- Design and Access Statement dated May 2024

REASON: To ensure high-quality placemaking, satisfactory design and amenity.

6. Notwithstanding the submitted details, prior to commencement of development full construction details of the access roundabout and footway/cycleway link provision along the B4005 as illustrated on drawings 3728-F04 Rev I and 3728-F06 Rev C respectively shall be submitted to and approved by the Local Planning Authority. The construction details shall be submitted with and respond to the findings of a Stage 2 Road Safety Audit. Prior to first occupation the access and footway shall be completed in all respects in accordance with the approved details and maintained as such thereafter.

REASON: To ensure that a safe and sufficient access strategy is provided in accordance with Core Strategy policy 60, 61 and 62.

7. 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.

8. The development shall be undertaken in accordance with the recommendations of mitigation measures for dust and air made by Cass Allan set out at appendix 7.3 of ES Vol 1. The mitigation measures shall be retained for lifetime of the development unless improvements to the agreed mitigation measures are required.

REASON: In the interests of public health and amenity

9. No development shall commence until, concurrent with the subsequent Reserved Matters application, details of the fuel filling facilities (including filling points, storage containers, pipework, vents and gauges) above and below ground, together with details of the storage facilities for oils, fuels and/or chemicals have been submitted and approved in writing by the LPA. All filling points and tank overflow pipe outlets should be designed to discharge downwards into the bund and be noted on a plan shall be submitted to and approved in writing by the LPA (in consultation with the Environment Agency) and the development hereby approved shall be undertaken and carried out in accordance with the approved

details.

REASON: To ensure pollution prevention and in the interests of public health and safety

10. No development shall commence until, concurrent with the subsequent Reserved Matters application, a Site Management Plan has been submitted to and approved in writing by the LPA (in consultation with the Environment Agency) containing appropriate procedures, training and equipment to be provided for the site to adequately control and respond to any emergencies including the clean-up of spillages, to prevent environmental pollution from the site operations. This will be reviewed with the Environment Agency. The development shall be undertaken and carried out in accordance with the approved details.

REASON: To ensure pollution prevention and in the interests of public health and safety

11. The subsequent Reserved Matters application shall include details of waste and recycling facilities (including location and range of facilities) to be submitted to and approved in writing by the Local Planning Authority. The details should estimate the type and quantity of waste generated by the commercial premises and plans should demonstrate that the space is suitable for the waste generated, preferably with containers drawn in situ. Tracking should be provided to show that the Refuse Collection Vehicles can access the storage point or a designated collection point.

REASON: In the interests of public health and safety.

12. The development shall not be first brought into use until the approved recycling facilities have been completed and made available for use in accordance with the approved details and they shall be subsequently maintained in accordance with the approved details thereafter.

REASON: In the interests of public health and safety.

13. Within 12 months of the development being first brought into use a final Certificate shall have been submitted and approved in writing by the Local Planning Authority certifying that the "Excellent" BREEAM standard (or any such equivalent national measure of sustainable building which replaces that scheme) has been achieved by the development.

REASON: To ensure that the objectives of sustainable development set out in policy CP41 and CP57 of the Wiltshire Core Strategy are achieved.

14. Prior to the commencement of any development and concurrently with any future reserved matters application(s), Sustainable Energy Strategy(ies), including coverage of operational energy, embodied carbon and climate change adaptation measures shall be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved details.

REASON: To ensure that the objectives of sustainable development set out in policy CP41 and CP57 of the Wiltshire Core Strategy are achieved.

15. Prior to the commencement of car park works, a detailed scheme and phasing strategy for the installation of Electric Vehicle (EV) charging points on site shall be submitted to and approved in writing by the Local Planning Authority. The scheme and phasing strategy shall include an up to date grid capacity assessment and a timetable for implementation of charging points to serve

parking bays. Subject to the availability of suitable grid capacity the development will initially include EV charging facilities for 50 car parking spaces. Details of the type of active charge points and details of ducting for all parking areas (including but not limited to HGV, Coach and Caravan parking areas) and a commitment to annual monitoring for a period of 5 years shall also be provided, with the objective being to maximise EV charging provision on site subject to demand and grid capacity. The development shall be carried out in accordance with the approved scheme and phasing strategy.

REASON: To ensure that the objectives of sustainable development set out in policy CP41, CP55, CP57 and CP60 of the Wiltshire Core Strategy are achieved.

16. No development shall commence above slab level until full details of secure cycle parking have been submitted to and approved in writing by the LPA. The development shall not be first brought into use until cycle parking has been provided in accordance with the approved details, and it shall thereafter be retained and kept available for that use.

REASON To ensure satisfactory cycle parking to encourage travel by cycle

17. The Motorway Rest Area hereby approved 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.

18. 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.

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

19. The development shall not be brought into first use until a National Highways signage agreement is obtained, and all required motorway/strategic /local road network direction signs must be installed prior to operation.

REASON: In the interests of highway safety and in accordance with the requirements of DfT Circular 01/2022

20. No development shall commence on site until a detailed drainage strategy for the site, incorporating sustainable drainage details, has been submitted to and approved in writing by the Local Planning Authority and detailing the following matters.

- Evidencing how the surface water disposal hierarchy has been applied and how all other options have been exhausted. This will include but not be limited to soakaway tests in accordance with BRE365 / demonstration that groundwater is shallow and would be within 1m of the invert of potential soakaway features.
- Demonstrate that the southern and eastern parts of the site can be drained by the drainage network in the 1 in 30 year rainfall event with no flooding on the site.
- Ensure other mitigation measures are in place in accordance with the submitted approved FRA.
- The calculations should set the MADD factor / additional storage value to 0m³/ha to prevent an over-estimation of attenuation storage available on site.
- Due to outfall to an ordinary watercourse, the calculations should also be simulated with a

surcharged outfall, to ensure that this does not cause flooding on site.

- The drainage drawings should show the pipe/link & manhole/ node numbers used in the calculations in order to link the drawings with the detailed calculations.
- demonstrate that for the 1 in 1 year event, discharge rates are restricted to 70% of 1 in 1-year greenfield rates.
- calculations which demonstrate that the required 20% betterment against greenfield rates has been achieved for all storm events between the 1 in 1 year and the 1 in 100-year return period storm events.
- Full labelled drawings for the proposed drainage layout, including layout plans to show the pipe network and attenuation ponds, which should correspond with the drainage calculations.
- Cross sections and design details for attenuation and any components.

The development shall then be carried out in accordance with the approved details. The site shall not be brought into operation until the surface water drainage has been constructed in accordance with the approved scheme.

REASON: To ensure that the development can be adequately drained.

NOTE: All proposals should be designed in accordance with National Standards for SuDS and the latest CIRIA SuDS Manual (C753).

21. No development shall commence until 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.

22. No development shall commence on site until a scheme to dispose of foul drainage, including connection to the public foul sewer network, has been submitted to, and approved in writing by the local planning authority. The scheme shall be implemented in accordance with the approved details.

REASON: To ensure that the proposed development does not pose an unacceptable risk to the water environment.

23. Upon completion of the drainage works a management and maintenance plan for the SuDS features and drainage network must be submitted to and approved in writing by the Local Planning Authority. The scheme shall include:

1. Provision of complete set of as built drawings for site drainage.
2. Maintenance and operational activities.
3. Arrangements for adoption and any other measures to secure the operation of the scheme throughout its lifetime.

REASON: To prevent flooding by ensuring the satisfactory storage of/disposal of surface water from the site.

24. 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.

25. Prior to the installation of any roof top mounted solar PV panels, details shall be submitted and approved in writing by the LPA (in consultation with the strategic highway authority). The submitted details shall include the proposed PV panel orientation and a Glint and Glare Assessment. The approved details including any 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.

26. No development shall commence on site (including any works of demolition), until a Construction Management Plan (CMP), has been submitted to and approved in writing by the local planning authority.

The plan shall include details of the measures that will be taken to reduce and manage the emission of noise, vibration and dust during the demolition and/or construction phase of the development. It shall include details of the following:

- a) The movement of construction vehicles;
- b) The parking of vehicles of site operatives and visitors;
- c) The cutting or other processing of building materials on site;
- d) Wheel washing and vehicle wash down facilities;
- e) The transportation and storage of waste and building materials;
- f) The storage of plant and materials used in constructing the development;
- g) The erection and maintenance of security hoarding including decorative displays and facilities for public viewing, where appropriate;
- h) A scheme for recycling/disposing of waste resulting from demolition and construction works;
- i) Measures for the protection of the natural environment;
- j) Pre-condition photo survey of local roads and highway infrastructure;
- k) Large Vehicle Routing plan;
- l) Traffic Management Plan (including signage drawing(s));
- m) Details of temporary/permanent Traffic Regulation Orders;
- n) Construction phasing plan;
- o) The loading and unloading of equipment and materials;
- p) The location and use of generators and temporary site accommodation;
- q) Where piling is required this must be continuous flight auger piling wherever practicable to

minimise impacts;

The approved CMP shall be adhered to throughout the construction period. The development shall not be carried out otherwise than in accordance with the approved construction method statement without the prior written permission of the Local Planning Authority.

REASON: To minimise detrimental effects to the neighbouring amenities, the amenities of the area in general, detriment to the natural environment through the risks of pollution and dangers to highway safety, during the construction phase.

27. No development shall commence on site, including demolition, ground works/excavation, site clearance, vegetation clearance and boundary treatment works, until a Construction and Environmental Management Plan (CEMP) has been submitted to and approved in writing by the local planning authority. The CEMP shall include details of the avoidance, mitigation and protective measures to be implemented before and during the construction phase, including but not necessarily limited to the following, and the development shall be carried out in strict accordance with the approved CEMP:

- a) An introduction consisting of construction phase environmental management plan, definitions and abbreviations and project description and location;
- b) A description of management responsibilities;
- c) A description of the construction programme;
- d) Detailed Site logistics arrangements;
- e) Details regarding parking, deliveries, and storage;
- f) Details regarding dust and noise mitigation;
- g) Details of temporary external lighting of the site. This information shall include a layout plan with beam orientation and a schedule of equipment proposed in the design (luminaire type, mounting height, aiming angles and luminaire profiles).
- h) Details of the hours of works and other measures to mitigate the impact of construction on the amenity of the area and safety of the highway network;
- i) Site working hours and a named person for residents to contact; and
- j) Identification of ecological protection areas/buffer zones and tree root protection areas and details of physical means of protection, e.g. exclusion fencing;
- k) Working method statements for protected/priority species, such as nesting birds, and reptiles. The working method statement shall include all precautionary measures to be implemented during the construction period, for the protection of sensitive habitats and species known to be present within or adjacent the site, with particular reference to reptiles.
- l) Mitigation strategies already agreed with the local planning authority prior to determination, such as for great crested newts, dormice or bats; this should comprise the pre-construction/construction related elements of strategies only.
- m) Work schedules for activities with specific timing requirements in order to avoid/reduce potential harm to ecological receptors; including details of when a licensed ecologist and/or ecological clerk of works (ECoW) shall be present on site.
- n) Key personnel, responsibilities and contact details (including Site Manager and ecologist/ECoW).
- o) No external night-time works or use of artificial lighting during the construction phase;
- p) a scheme to treat and remove suspended solids from surface water run-off during construction
- q) oils/chemicals and materials storage including refuelling
- r) the location and pollution prevention for storage areas and compounds
- s) the control, storage and removal of spoil and waste

Construction hours shall be limited to 0800 to 1800 hrs Monday to Friday, 0800 to 1300 hrs Saturday and no working on Sundays or Bank Holidays.

REASON: To ensure appropriate levels of amenity are achievable and to ensure adequate protection and mitigation for ecological receptors prior to and during construction, and that works are undertaken in line with current best practice and industry standards and are supervised by a suitably licensed and competent professional ecological consultant where applicable.

28. If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the local planning authority) shall be carried out until a remediation strategy detailing how this contamination will be dealt with has been submitted to, and approved in writing by, the local planning authority. The remediation strategy shall be implemented as approved.

REASON: To ensure that the development does not contribute to, and is not put at unacceptable risk from or adversely affected by, unacceptable levels of water pollution from previously unidentified contamination sources at the development site. This is in line with paragraph 187 of the National Planning Policy Framework

29. Piling and foundation designs using penetrative methods shall not be carried out other than with the written consent of the local planning authority. Where piling and deep penetrative methods are required, the applicant shall submit supporting details including a structural engineers statement confirming the proposed piling/drilling is secure and acceptable. The development shall be carried out in accordance with the approved details.

REASON: To ensure that the proposed piling/ foundation works do not harm the surrounding highway network or destabilise local topography. Piling and foundation designs using penetrative methods can result in risks to the land stability and pollution.

30. No development shall commence on site including site clearance until a Landscape and Ecology Management Plan (LEMP) shall be submitted to and approved in writing by the Local Planning Authority. The LEMP will include long term objectives and targets, management responsibilities and maintenance schedules for each ecological feature within the development, together with a mechanism for monitoring success of the management prescriptions, incorporating review and necessary adaptive management in order to attain targets. The LEMP shall be implemented in full and for the lifetime of the development in accordance with the approved details.

REASON: To ensure the long-term management of landscape and ecological features retained and created by the development, for the benefit of visual amenity and biodiversity for the lifetime of the scheme.

31. For the avoidance of doubt and notwithstanding the separate condition requiring details to be submitted in relation the landscaping adjacent to the strategic highway, no development shall commence above ground floor slab level until full details of a hard and soft landscaping for the site (other than the strategic highway boundary) has been submitted to and approved in writing by the Local Planning Authority, the details of which shall include: -

- a) Location and current canopy spread of all existing trees and hedgerows on the land; Full details of all existing trees and hedging to be retained, together with measures for their protection during development;
- b) A detailed planting specification showing all plant species, supply and planting sizes and planting densities

- c) All means of enclosure and internal boundary treatments
- d) Children's play equipment and picnic area equipment;
- e) Vehicle parking layouts;
- f) Refuse/recycling collection points;
- g) Bin storage areas;
- h) Other vehicle and pedestrian access and circulation areas;
- i) All hard and soft surfacing materials.

REASON: In order that the development is undertaken in an acceptable manner, to ensure a satisfactory landscaped setting for the development and the protection of existing important landscape features.

32. No part of the development hereby permitted shall be brought into use until a Framework Travel Plan has been submitted to and approved in writing by the Local Planning Authority in consultation with National Highways and Wiltshire Council as Highway Authority. The site shall operate in full accordance with the approved Travel Plan thereafter.

REASON: In the interests of sustainable transport, CP61 of the WCS

33. All soft landscaping comprised in the approved details of landscaping shall be carried out in the first planting and seeding season following the first occupation of the building(s) or the completion of the development whichever is the sooner. All shrubs, trees and hedge planting shall be maintained free from weeds and shall be protected from damage by vermin and stock. Any trees or plants which die, are removed, or become seriously damaged or diseased shall be replaced in the next planting season with others of a similar size and species, unless otherwise agreed in writing by the local planning authority. All hard landscaping shall also be carried out in accordance with the approved details prior to the occupation of any part of the development or in accordance with a programme to be agreed in writing with the Local Planning Authority.

REASON: To ensure a satisfactory landscaped setting for the development and the protection of existing important landscape features.

34. No development hereby approved shall commence until full details of all permanent external lighting of the site has been submitted to, and approved in writing by, the Local Planning Authority in consultation with National Highways. This information shall include a layout plan with beam orientation and a schedule of equipment proposed in the design (luminaire type, mounting height, aiming angles and luminaire profiles). The permanent lighting shall be installed in full, maintained and operated in accordance with the approved details at all times that the development is operational.

Before the first use of the approved lighting scheme approved, the applicant shall appoint a suitably qualified member of the institute of lighting professionals (ILP) to validate that the lighting scheme as installed conforms to the recommendations for environmental zone E2 or better in the ILP document "Guidance Notes for the Reduction of Obtrusive Light - Guidance Note 01:20. A letter written by a suitably qualified member of the ILP confirming this shall be submitted to the Local Planning Authority. The scheme shall thereafter be permanently retained in accordance with the details submitted.

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 and Core policy 57, Ensuring high design and place shaping such that appropriate levels of amenity are achievable.

35. An assessment of the acoustic impact arising from the operational mechanical plant and for

onsite vehicle movements associated with the operational phase of the development shall be undertaken in accordance with BS 4142: 2014 +A1:2019. Background levels are to be taken as a LA90 1 hour and the ambient noise levels shall be expressed as an LAeq 1 hour during the daytime [07:00- 23:00] and shall be expressed as an LA90 and LAeq 5 minutes during the night [23:00 – 07:00] and measured at the closest possible point to the nearest residential noise-sensitive receptors, with the final location to be agreed with the LPA in writing.

The assessment shall be submitted to the Local Planning Authority at reserved matters stage together with a scheme of attenuation measures to demonstrate the development can achieve a rating level of 5dB below the typical background (LA90) level at the nearest noise sensitive location.' If the precise detail of the scheme is not known, then likely worst-case scenarios with respect to noise impact on residential premises should be assumed. The scheme shall be submitted to and approved in writing by the Local Planning Authority. The details as approved shall be implemented prior to occupation of the development and thereafter be permanently retained.

36. The use hereby permitted shall not operate until a scheme containing full details of arrangements for internal air extraction, odour control and discharge to atmosphere from cooking operations, including the location and appearance of any external ducting and flues, has been submitted to and approved in writing by the Local Planning Authority. The scheme must include full technical details and a risk assessment in accordance with Appendix 2 and 3 respectively of the EMAQ "Control of odour and noise from commercial kitchen exhaust systems" Guidance (Gibson, 2018).

The works detailed in the approved scheme shall be installed in their entirety before the operation of the use hereby permitted. The equipment shall thereafter be maintained in accordance with the manufacturer's instructions for the lifetime of the development and operated at all times when cooking is being carried out.

REASON: Core policy 57, Ensuring high design and place shaping such that appropriate levels of amenity are achievable.

INFORMATIVES TO APPLICANT:

1. This permission shall be read in conjunction with an Agreement made under Section 106 of the Town and Country Planning Act, 1990 and dated the [INSERT TO BE ADDED ONCE S106 IS SEALED AT LATER DATE].

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

2. The applicant must obtain Thames Water's permission for any connections to their infrastructure. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.

3. There are water mains crossing or close to your development. Thames Water do NOT permit the building over or construction within 3m of water mains. If you're planning significant works near our mains (within 3m) we'll need to check that your development doesn't reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. <https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes>

4. An environmental permit is required for any works within 8m of a main river. Consult the Environment Agency's main river map to see if a river/watercourse is designated as a main river. For more guidance on environmental permits, consult the website: [Check if you need an environmental permit - GOV.UK](#).

5. Wiltshire Council is the Lead Local Flood Authority that has the lead responsibility for surface water management, the discharge rate from the site must be agreed with Wiltshire Council as part of agreeing the surface water drainage strategy for the site. Wiltshire Council's land drainage byelaws can be downloaded at: [Drainage - Wiltshire Council](#). The land drainage consent application form and guidance notes can be found on our website at: [Land drainage and ordinary watercourse - Wiltshire Council](#)

6. Storage of fuels, oils and chemicals

Materials and chemicals likely to cause pollution should be stored in appropriate containers and adhere to guidance for the storage of drums and intermediate bulk containers.

Any facilities, above ground, for the storage of oils, fuels or chemicals shall be sited on impervious bases and surrounded by impervious bund walls. The volume of the bunded compound should be at least equivalent to the capacity of the tank plus 10%.

All filling points, vents, gauges and sight glasses must be located within the bund. The drainage system of the bund shall be sealed with no discharge to any watercourse, land or underground strata. Associated pipework should be located above ground and protected from accidental damage. All filling points and tank overflow pipe outlets should be designed to discharge downwards into the bund.

Appropriate procedures, training and equipment must be provided for the site to adequately control and respond to any emergencies including the clean-up of spillages, to prevent environmental pollution from the site operations.

The EA advise that polluting materials and chemicals are stored in an area with sealed drainage.

Please contact the EA National Customer Call Centre (Tel: 03708 506 506) for further information and guidance.

Additional information and guidance is available at:

- Oil storage regulations for businesses - GOV.UK
- Design of containment systems for the prevention of water pollution from industrial incidents

7. A permit to discharge (Environmental Permit) will be required if the construction period is greater than 3 months and the discharge is to surface waters. Any discharge will be governed by strict limits on suspended solids, pH, and if flocculants are used, an iron or aluminium limit.

