

Development Management
Wiltshire Council
County Hall
Bythesea Road
Trowbridge
Wiltshire
BA14

6750 – Moto Leigh Delamere

27th February 2026

Dear Sir/Madam,

Submission of Detailed Planning Permission under the Town and Country Planning Act 1990 (as amended) at Moto Leigh Delamere Eastbound, Chippenham

This letter accompanies an application seeking detailed planning permission which has today been submitted to Wiltshire Council as the Local Planning Authority (LPA) via the Planning Portal (Ref. PP-14716775) on behalf of our client, Moto Hospitality Ltd, seeking the following at Moto Leigh Delamere Services, M4 Eastbound, Chippenham, SN14 6LB (the 'Site'):

'Reconfiguration of eastern car and HGV parks and circulation routes, associated road markings, resurfacing existing tarmac, installation of electric vehicle charging points, canopies, and associated charging infrastructure including Battery Energy Storage System, and associated works'.

Planning Application Documents

This planning application is supported by a number of drawings and documents in line with national and local validation requirements. These have been submitted via the Planning Portal, and comprise the following:

- Planning Application Form and Ownership Certificate.
- CIL Form 1: Additional Information.
- Application Covering Letter.
- Drawings Package prepared by Moto Hospitality Ltd, comprising:
 - Site Location Plan;
 - Existing Site Plan;
 - General Arrangement Plan;
 - Moto Charge Totem drawing package.
- A400 EV charger data sheet, prepared by ABB E-mobility.
- PixiiBox data sheet, prepared by Pixii.

- PowerShaper XLP storage system data sheet, prepared by Pixii.
- PowerBase XLP storage system data sheet, prepared by Pixii.
- Transport Statement, prepared by Cora IHT

Application Site

The Site is the eastbound (north) motorway service centre for the M4 between Junctions 17 and 18. It is typical of many other motorway service facilities in that it is accessed via a slip-road from the M4 carriageway, and features internal roadways and vehicle parking (for standard cars to the west of the Site and a separate area for Heavy Goods Vehicles (HGVs) to the east), a building providing food and convenience outlets, and a petrol station. Much of the Site is shielded from the motorway by planting and trees. The total area of the Site (the red line boundary) is 2.2ha.

The Site is not covered by any statutory planning designations, nor is it located within Flood Zones 2 or 3.

Having reviewed the Council's Planning Register, there are several planning application seeking works/improvements at this motorway service centre, which have been approved. These include applications for:

- A new drive-through coffee kiosk and associated alternations to the main car park (18/08632/FUL, approved 13.11.19).
- The installation of 1no. Electric Vehicle Charging Point (EVCP) in the main car park (13/05280/FUL, approved 16.12.16).
- A standalone retail building next to the existing amenity building (N/12/03436/FUL, approved 30.11.12).
- The installation of solar panels to the roof of the main building (N/11/03265/FUL, approved 12.12.11).

In addition, several advertisement consents have been granted for adverts/signs on the Site. Altogether, the planning history for the Site suggests that the principle of making changes to this motorway service centre is firmly established.

Proposed Development

This application seeks planning permission to remodel and improve the existing car and HGV park to the east of the main service centre building. This will involve replacing the existing tarmac, resulting in no change to appearance, and new whitelining which will facilitate changes to vehicle parking provision whilst improving its appearance and aiding driver navigation.

This will change the car parking provision from 73no. spaces as existing to 123no. spaces and an additional 18no. electric vehicle (EV) charging bays powered by 9no. charging columns along with

associated charging point canopies. In addition, the proposals will see the 40no. existing HGV parking spaces be reorganised to provide 62no bays. The existing and proposed car and HGV parking layouts are shown on drawing nos. LEIGHEB_100_000 and LEIGHEB_100_001 respectively.

To facilitate the provision of EV charging spaces, the proposals also include ancillary EV charging equipment and cable routing leading to a Battery Energy Storage System (BESS), which will be located to east of the EV charging space and be surrounded by a close-board timber fence which will be 2.4m in height. This fence will have a Armco barrier measuring 760mm in height around its base to minimise potential damage to the fence from manoeuvring vehicles in case they strike it. The BESS system will handle less than 1MW of energy, therefore the guidance from the National Fire Chiefs Council published in 2025 is not applicable.

The proposals only affect the eastern car park, with the car park to the west of the Site remaining unchanged. In addition, the proposals will not encroach onto or result in the removal of any existing green space or landscaped areas, nor require the removal of any existing trees. Existing on-site drainage infrastructure will be retained and utilised, as there is no requirement from the proposals to change existing drainage capacity.

Planning Policy Appraisal

Statutory Development Plan

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that *‘where in making any determination under the planning Acts, regard is to be had to the development plan, the determination shall be made in accordance with the plan unless material consideration indicates otherwise’*.

The statutory development plan relevant to the Site comprises the Wiltshire Core Strategy (2015) and Saved Policies from the North Wiltshire Local Plan (2011, saved in 2009).

Other material considerations include the National Planning Policy Framework (2024) and National Planning Practice Guidance (PPG) (2024), and the emerging Wiltshire Local Plan (Regulation 19, 2023). The latter was submitted to the Secretary of State for Housing, Communities, and Local Government for independent examination in 2024 and was subject to Stage 2 hearings in late 2025. It is therefore at an advanced stage of the plan-making process, with its draft policies attracting increasing weight in planning terms.

In addition, the Department for Transport (DfT) Circular 01/2022 (the ‘Circular’) *‘Strategic road network and the delivery of sustainable development’* is relevant to the determination of this application, given that it forms the policy of the Secretary of State in relation to the Strategic Road Network (SRN) and as confirmed in paragraph 8, should be read in conjunction with the NPPF. It also provides policy guidance on the development of motorway and roadside services.

Following review of the relevant policies and guidance and in light of the nature of the proposals, it is considered that the main planning considerations which are relevant to the assessment of this application are the principle of development, transport and access, and landscape and biodiversity. These are considered further below, alongside a brief section addressing the fact that there will be no changes to flood risk as a result of the proposals.

Principle of Development

At the heart of the NPPF is a presumption in favour of sustainable development. Paragraph 8 of 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 (so that opportunities can be taken to secure net gains across each of the different objectives): an economic objective; a social objective; and an environmental objective. In regard to the three objectives, the NPPF states:

- a) *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;*
- b) *A social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and*
- c) *An environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.*

Chapter 9 of the NPPF relates to promoting sustainable transportation. Paragraph 111(e) states that planning policies should:

'... Provide for any large scale transport facilities that need to be located in the area⁴⁶, and the infrastructure and wider development required to support their operation, expansion and contribution to the wider economy. In doing so they should take into account whether such development is likely to be a nationally significant infrastructure project and any relevant national policy statements'.

Footnote 46 of the NPPF, as referred to in Paragraph 111(e), states:

‘Policies for large scale facilities should, where necessary, be developed through collaboration between strategic policy-making authorities and other relevant bodies. Examples of such facilities include ports, airports, interchanges for rail freight, public transport projects and roadside services. The primary function of roadside services should be to support the safety and welfare of the road user (and most such proposals are unlikely to be nationally significant infrastructure projects)’.

Footnote 46 refers to the importance of roadside services in supporting road users, and by extension, the operation and safety of motorways.

The proposals will improve the capacity of the existing motorway service centre where the revised layout will mean it can accommodate an increased number of vehicles at any one time, including EVs which have become more popular with road users in recent years. This means that the service centre will be able to better aid a greater number of road users who want to rest during their journeys, which is in line with the aspiration of Footnote 46 and Paragraph 111 of the NPPF.

DfT Circular 01/2022 formalised new and updated policy concerning the provision of motorway and roadside facilities. Prior to the Circular being updated, guidance regarding the provision of facilities was largely limited to motorway service areas. The guidance stated that the maximum distance between MSAs should be situated at a maximum of 30 minutes travelling time, or no more than 28-miles. No guidance was previously available regarding the spacing between facilities specifically for goods vehicles.

Paragraph 71 under the heading ‘Roadside Facilities’ states:

‘The primary function of roadside facilities is to support the safety and welfare of road users. Roadside facilities should be sympathetic to the character of the site and its surrounding area, and create a safe, inclusive and accessible environment. In most cases it is for the private sector to promote roadside facilities, although there may be a role for the company and local highway authorities to provide these where a need arises’.

In respect of ‘General Purpose Facilities’, the Circular sets out in Paragraph 75 that:

‘The network of signed roadside facilities on the SRN is intended to provide opportunities to stop at intervals of approximately half an hour. However, the timing is not prescriptive as travel between services may take longer on congested parts of the SRN’.

And, at Paragraph 76, that:

‘On this basis, the maximum distance between signed motorway service areas should be 28 miles. Speed limits on the SRN vary and therefore, applying the same principles, the maximum distance between signed services on APTRs [all-purpose trunk roads] should be the equivalent of 30 minutes driving time’.

The Circular then provides guidance on the provision and spacing between facilities. Paragraph 80 of the Circular states:

'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'.

Paragraph 81 then sets out that where there is an identified need for parking facilities for HGVs, National Highways will work with relevant local planning authorities to ensure that 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; and

(ii) the maximum distance between APTR facilities providing HGV parking (being service areas or truckstops) should be the equivalent of 20 minutes driving time for HGVs'.

Paragraph 82 sets out that where the general spacing distances above are met, but a need for HGV parking still arises, National Highways will support the case to address unmet demand, subject to an assessment of the safety of the proposed access or egress arrangements. As aforementioned, there are no changes to access or egress arrangements or junction design, therefore no changes to highway safety are likely to arise. Even where facilities do not comply with this spacing, they are not required to close or relocate, and should not be subject to a retrospective compliance obligation.

In this instance, the Transport Statement confirms that daily HGV parking demand exceeds 100%, consolidating the need to allow for more HGV parking, and that standard parking demand also exceeds 100%. The proposals set out a way to achieve this would resulting in any land take from adjacent green spaces; instead, it is proposed to use the existing space more efficiently.

The proposals represent the expansion of an existing motorway roadside service facility on the SRN, including the creation of additional parking in line with the direction of Paragraph 80 of the Circular, which at Paragraph 71 attributes the primary function of these facilities as supporting the safety and welfare of road users.

As set out in further detail in the next section, arrangements for access and egress on the Site are not proposed to be altered. The proposals are therefore in line with Paragraph 82 of the Circular.

Overall, the proposals are considered to be fully compliant with the relevant provisions of the Circular and the NPPF, and will aid and improve road user safety and the operation of the motorway overall

without giving rise to adverse highways impacts. The principle of development is therefore considered to be firmly established.

Transport and Access

At a local level, Core Strategy Policy 60 sets out the Council's approach to promoting a sustainable transport system, noting that it will use its planning and transport powers to develop, maintain, and improve such a system. This is reflected in emerging Local Plan Policy 70. Core Strategy Policy 66 and emerging Local Plan Paragraph 5.46 refers to the strategic transport network in Wiltshire, which includes the M4. Its function is to cater to the efficient movement of inter-urban and long-distance trips. In doing so, it supports the vision and objectives of the Core Strategy as a whole.

The Transport Statement which accompanies this planning application sets out that arrangements relating to access and egress for the Site will not change as a result of the proposals, nor will there be any change to junction design or geometry. This means that the proposals are unlikely to have any discernible adverse impact on highways safety or operation in line with Core Strategy Policy 72.

The increase in parking capacity at the Site is derived from a revised layout for both the car and HGV car parks, which is more efficient than the existing layout and can accommodate a greater number of vehicles within the same area whilst allowing sufficient space for navigation and manoeuvring.

In terms of trip generation, no 'new' trips are envisioned as the motorway service centre is not, and will not become, a destination in its own right. The trips made to and from the centre are a part of longer journeys to other destinations, and the proposed improvements to the centre will not affect the number or frequency of trips made via the service centre overall. Therefore, there will be no effects on the strategic road network or the motorway, and the proposals will not result in increased reliance on private vehicles. The proposed development is considered to be in line with planning policy at a national and local level, including emerging Local Plan Policy 74 which suggests that servicing sites must be sufficient along routes which experience significant volumes of freight and movement.

The proposed works seek to improve the motorway service centre through enhancing its internal navigability, parking capacity, and making greater provision for EVs. The works will help the centre be able to respond to changing transport behaviours and growing needs for alternative parking provision. Accommodating the needs of EV users in particular is in line with the environmental objective in Paragraph 8 of the NPPF, as the use of EVs over petrol- and diesel-powered cars is better for the environment and aids the shift to a low-carbon economy. It also aligns with emerging Local Plan Policy 70 which sets out that the Council will work with others to deliver EV charging infrastructure.

Collectively, the proposals will improve the operation and efficiency of the M4 motorway and local SRN, in line with the aspiration of Core Strategy Policies 66 and 60 and emerging Local Plan Policy.

Landscape and Biodiversity

The Government's guidance notes that developments which are below the threshold to trigger a requirement for Biodiversity Net Gain (BNG) include those which do not impact a priority habitat and impacts less than 25 square metres of on-site habitat or 5 metres of on-site linear habitats.

There are no priority habitats within the site, nor are there 5m of on-site linear habitats. The proposals will affect less than 25sqm on-site habitat. Therefore, the proposals do not trigger the requirement for BNG.

As aforementioned, the proposals will not encroach onto or result in the removal of any existing green space or landscaped areas, or any existing trees. The increase in parking capacity does not come at the expense of any open or green space.

Flood Risk Assessment

As aforementioned, existing on-site drainage infrastructure will be retained and utilised, as there is no requirement from the proposals to change existing drainage capacity. There is also no increase in permeable area. As a result, there will be no changes to existing or proposed flood risk or capacity.

Next Steps

The statutory planning application fee of £2,578, which is based on the maximum (capped) fee for 'other operations', has been paid via the Planning Portal.

I would be grateful if you could provide written confirmation of receipt of this planning application at your earliest convenience.

Please contact me via arjun.singh@lanpro.co.uk or 07442 103868 should you have any queries about this application. I look forward to working with you during the determination period to achieve a successful conclusion.

Yours faithfully

Arjun Singh MRTPI

Associate, Planning