



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

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

To: Wiltshire Council (FAO David Millinship)
developmentmanagement@wiltshire.gov.uk

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

Council's Reference: PL/2026/01491

Location: Service Station, Leigh Delamere Motorway Services Eastbound, Leigh Delamere, SN14 6LB

Proposal: 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

National Highways Ref: NH/26/15435

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

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

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

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

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

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

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

Signature: *G Gallacher*

Date: 01 April 2026

Name: Gaynor Gallacher

Position: Assistant Spatial Planner

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

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

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

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

We have undertaken a review of the relevant documents supporting the planning application to ensure compliance with the current policies of the Secretary of State as set out in DfT Circular 01/2022 "The Strategic Road Network and the Delivery of Sustainable Development" and the National Planning Policy Framework (NPPF). This response represents our formal recommendations with regards to planning application reference PL/2026/01491.

Reasons

The application is seeking permission for the reconfiguration of parking provision with associated works within the M4 eastbound Motorway Service Area at Leigh Delamere to include EV charging provision and a BESS.

National Highways primary interest is the safe and efficient operation of the SRN which in this location comprises the M4 motorway. We have also considered the proposals against the roadside facilities criteria set out within DfT Circular 01/2022. It is in this context that our comments are made.

Having reviewed the submitted plans and associated Transport Statement prepared by Cora IHT Limited and dated February 2026, we have no objection in principle to the reconfiguration of the existing eastern car park and HGV park to increase parking provision to reflect an identified need during periods of peak parking demand, and to improve provision of EV Charging.

However, although we consider that internal layout is ultimately a matter for the services operator to determine, some areas of concern have been noted from a review of the submitted plans and which National Highways will expect the services operator to consider when implementing the proposed works:

- the proposed overflow parking area (which we assume are those spaces marked as ICE on the GA drawing) does not appear to be signed in advance and there is no indication as to how drivers seeking overflow parking provision will know where to route to. It may be that the services operator is proposing to employ banksmen or temporary signage during periods of peak demand, but this should be addressed.
- there appears to be no route for non-EVs to enter the petrol filling station from the overflow parking area prior to exiting the services. Whilst this reflects existing conditions in respect of staff and Lodge parking, we will expect the services operator to ensure that these movements can be safely

accommodated to remove the risk of unsafe manoeuvres occurring, or the risk of vehicles continuing their journey having been unable to refuel.

- the overflow parking spaces will utilise what is currently staff parking – we will expect the services operator to be satisfied that sufficient staff parking spaces will remain during periods of peak parking demand when the overflow area is utilised.
- the proposals will remove dedicated parking spaces for the Lodge, although it is accepted that Lodge parking demand is unlikely to coincide with peak periods of parking demand for the services.
- no vehicle swept paths have been provided to demonstrate that the reconfigured overflow and HGV parking areas can be utilised as intended. We will expect the services operator to be satisfied that vehicle swept paths have been appropriately considered in the revised layout.

It should also be noted that any changes that may be required to existing M4 Motorway signage will need to be the subject of a separate submission to National Highways.

Recommendation

National Highways has no objection to the proposals but offers the applicant and planning authority advice as above.

Standing advice to the local planning authority

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

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

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