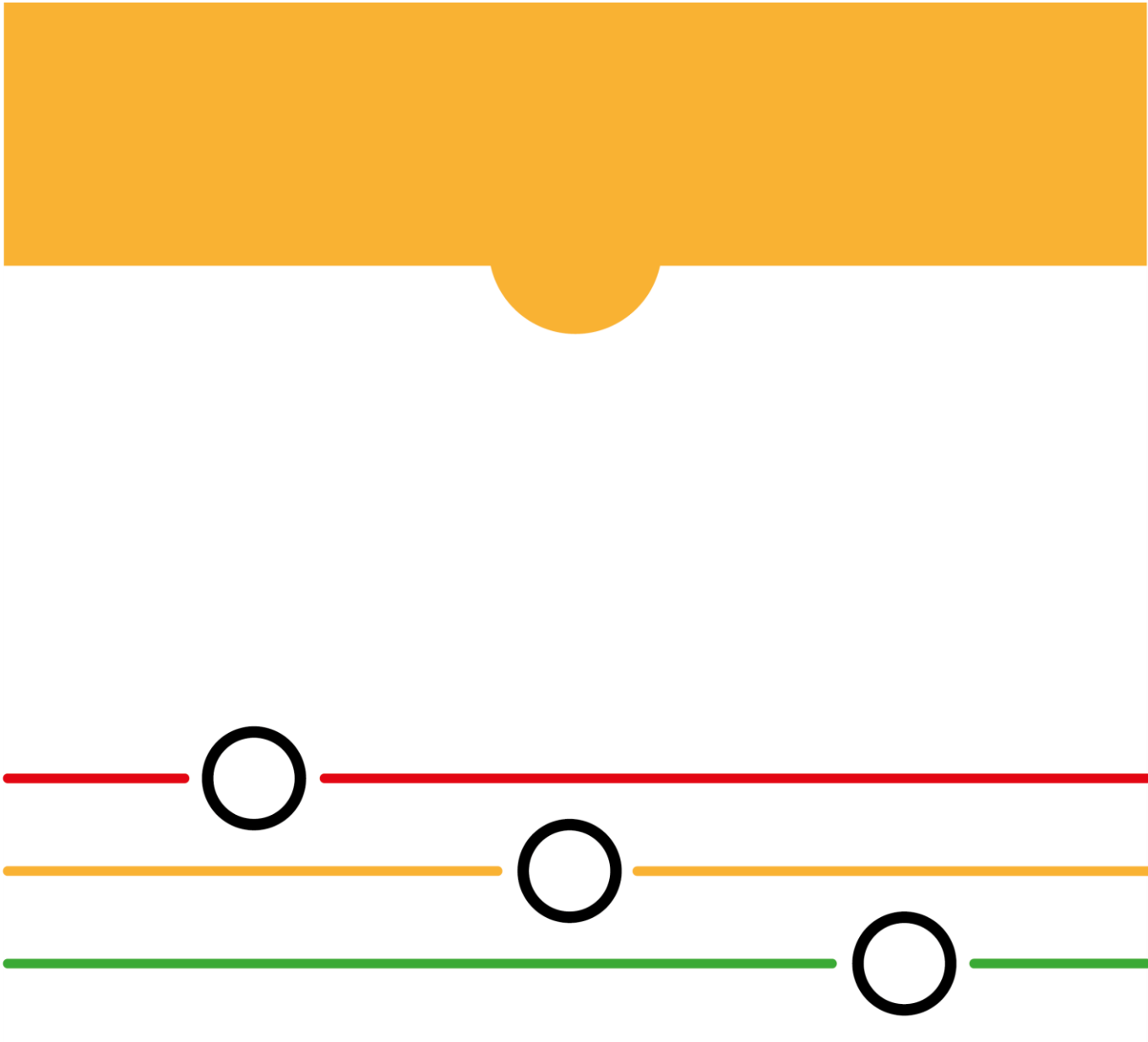




Welcome Break

Proposed Motorway Service Area Development,
M69 Junction 1, Hinckley

Technical Note

3711622



APRIL 2024

Note Details

Report Number:	3711622-TN
Report Title:	Technical Note – Appeal Statement, Proposed Motorway Service Area Development, M69 Junction 1, Hinckley
Client:	Welcome Break
Date:	10 April 2024
Status:	-

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1 Introduction

- 1.1 Dynamic Transport Planning Ltd is instructed by Welcome Break Ltd to report on the highways and transportation considerations related with the proposals for a Motorway Service Area (MSA) development off M69 Junction 1, Stretton Point, Hinckley.

Planning Context and Timeline

- 1.2 The proposed site is subject to a live full planning application, submitted in October 2023 (Application Reference Number: 23/01023/HYB) for the construction of motorway service area and associated car and HGV parking on land off the M69 Junction 1. The application is a cross-boundary application between Hinckley and Bosworth Borough Council and Rugby Borough Council.
- 1.3 The site benefits from extant planning approval for a mixed-use development including employment and leisure uses from 2013 (Application Reference Number: R16/1255) as well as planning approval for a Trunk Road Service Area comprising a PFS, drive-thru restaurant and a new vehicular access (Application Reference Number: 20/00531/HYB), which was approved by Hinckley and Bosworth Borough Council in 2020.

Pre-Application Process

- 1.4 Given the sites proximity to the M69 J1 and A5, which form part of the Strategic Road Network (SRN), pre-application discussions were undertaken with National Highways. A pre-application scoping note was produced by DTP in March 2023 and issued to NH, which outlined the proposals, preliminary site layout plan, parking provision, trip rates and proposed scope of the forthcoming Transport Assessment (TA).
- 1.5 NH provided positive pre-application advice in response to this in May 2023, which can be found at **Appendix 1**. The following was set out by NH in their pre-application advice that:
- Whilst the proposed site access was the same as previously approved on the site, this would be required to be assessed as part of the forthcoming TA;
 - NH agreed with the Motorway Service Area (MSA) trip rates, though requested individual trip rates for each land use on the site;
 - NH requested that a trip distribution exercise should be undertaken as part of the forthcoming TA; and
 - NH agreed that the methodology used to assess the proposed parking provision and deemed that this provision was sufficient in accordance with Circular 01/2022, though motorcycle parking should be provided.

1.6 Subsequent to the receipt of this pre-application advice, a meeting was held between DTP and NH in May 2023 to further discuss the scope of the TA. It was agreed within this meeting that:

- Thursday 18th and Saturday 20th May were acceptable to undertake traffic surveys of the M69 J1;
- That the TRICS category of MSA would suffice to determine trip rates rather than individual land uses; and
- That a LINSIG model as well as merge/diverge assessments would be suitable to assess M69 J1.

Planning Application Process

1.7 In cognisance of the pre-application sought from NH, a Transport Assessment (TA) and Travel Plan (TP) were produced by DTP in support of the planning application (Document Reference Numbers: DTP-3711622-TA-WithApps-RevA and DTP-3711622-RevA) in October 2023.

1.8 In December 2023, the above application received consultee comments from NH which can be found at **Appendix 2**. The response was positive, and NH outlined that:

- They deemed the trip generation assessment reasonable and accepted the trip rates presented;
- NH requested further details regarding merge/diverge assessments and requested access to the LINSIG model in order to audit and review the modelling outcomes; and
- Accepted the Travel Plan and acknowledged its inclusion of measures to mitigate traffic impacts where possible by encouraging a reduction in single occupancy car trips.

1.9 DTP were contacted by NH's then appointed highways consultants WSP by email on 4th December 2023 for access to the LINSIG model, which DTP provided. DTP enquired as to the status of the audit and review of the model in February 2024 at which point they were notified by WSP they were no longer working on this particular project for NH.

1.10 Thereafter, NH provided two revised consultation responses on the 14th and 19th February 2024, in which a number of matters previously agreed upon were reraised as areas of concern, which can be found at **Appendix 2**. The matters raised as new areas of concern (previously accepted by NH) included the need for an MSA, car, HGV and abnormal load parking, as well as trip generation and further details requested of the Travel Plan which are all further addressed in **Chapter 2** of this TN.

- 1.11 Concerned by the fundamental change to all prior advice received from NH in relation to the application, DTP organised a meeting with NH in order to further discuss the new areas of concern raised. A meeting was held between DTP and NH on 22nd February 2024 during which NH informed DTP that previous advice supplied during the pre-application process and consultation comments had been undertaken by junior members of the NH team alongside NH's transport consultants AECOM.
- 1.12 NH informed DTP that a more senior member of the NH team had now been appointed to the project, with AECOM no longer providing any transport advice on the project. Therefore, these revised consultation comments were now to replace all previous NH responses.
- 1.13 It is noted that both of the local highway authorities involved in this cross-boundary planning application confirmed no objection to the proposals as per the responses received from Warwickshire County Council on 23rd January 2024 and Leicestershire County Council on 18th March 2024.
- 1.14 This Technical Note (TN) has therefore been produced to address the series of new concerns raised within NH's February 2024 consultation responses.

2 Response to Latest NH Consultation Comments

- 2.1 A summary of the latest consultation comments made by NH setting out their fundamental change in position regarding the proposals are provided below alongside our responses.

Need for a Motorway Service Area

- 2.2 NH state the need for a new MSA in this location has not been demonstrated, though acknowledge that there may be need for increased HGV parking facilities with the East Midlands being located within an 'area of need' for HGV parking based on the DfT's National Lorry Parking Survey, which the applicant disputes, which is further discussed in the following section.
- 2.3 NH further acknowledge that although there should be no more than 28 miles between service areas on the SRN, the distance between services can be shorter and NH would not object to proposals that have demonstrated a need. It is acknowledged that the M69 currently spans over 22km of motorway without services areas of HGV parking facilities, highlighting the commercial benefit of providing an MSA in this location for the applicant.
- 2.4 Moreover, Paragraph 76 of Circular 01/22 sets out that 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 should be the equivalent of 30 minutes driving time.
- 2.5 The distance between Corley Services and Leicester Forest East Services is 36km and at peak times can be between 28 minutes and 40 minutes' drive which is clearly on the cusp of maximum thresholds set out in the Circular and therefore a need is demonstrated for an MSA at this location.
- 2.6 The requirement for HGV parking provision is addressed in further detail in the following section.

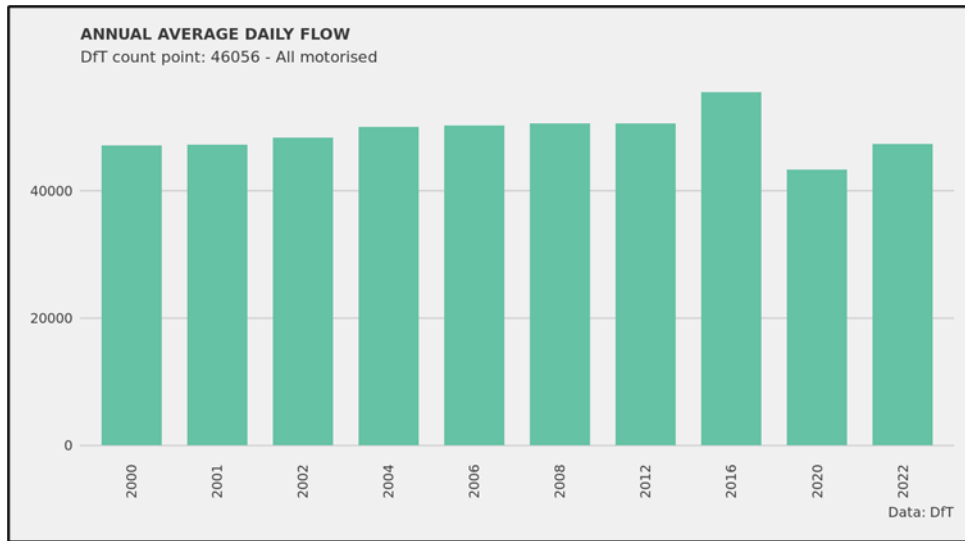
Minimum Requirements for an MSA

- 2.7 NH outline that further information is required to demonstrate that the scheme meets minimum requirements for an MSA. These matters are addressed as below:
- Fuel Provision – Now identified on updated site layout plan;
 - CCTV and Lighting – Now identified on updated site layout plan; and
 - Parking Provision – Further discussed in the following section.

Parking Provision

- 2.8 NH advise that Car and HGV parking provision should align with standards provided within DfT Circular 01/2022, based on the most recent complete year of data. NH agreed the car parking approach both during the pre-application stage and with their consultation response.
- 2.9 However, in their amended February 2024 response, NH make reference to the DfT Lorry Parking Survey (which was not referenced during any prior advice received from NH) to state that this survey indicated that the East Midlands was situated in an area of need for HGV parking. As a result of this, double the requirement of HGV parking would be expected from what had been proposed.
- 2.10 The submitted TA produced by DTP calculated parking requirements based on DfT Count Point 46056 on the M69, north of Junction 1. At the time of issue, the most up to date pre-COVID data provided by the DfT was for 2019, which was in fact an estimation based on 2016 counts.
- 2.11 Given the protracted length of time in which it has taken for NH to provide a series of consultation comments over a 10-month period, more recent data is now available, with a new count for 2022 for this count point released by the DfT.
- 2.12 The 2022 data indicates a reduction in flows on the M69 in this location in comparison to the estimates made by the 2019 data. The below figure shows that the DfT data recorded an abnormally high count in 2016, which reduced during Covid and then stabilised during 2022. Therefore, the 2022 data better reflects the average daily flows in this location. It is noted that this data represents a more recent set of data from the source already agreed as suitable for use in the parking assessment by NH.

Figure 2.1: Annual Average Daily Flows for DfT Count Point 46056



- 2.13 A revised site layout is provided at **Appendix 3**, which details an increase in the parking provision at the site. The relevant impact on the parking requirements for the site based on the updated traffic flows is shown in the table below:

Figure 2.2: Updated Parking Requirements for 2022 DfT data

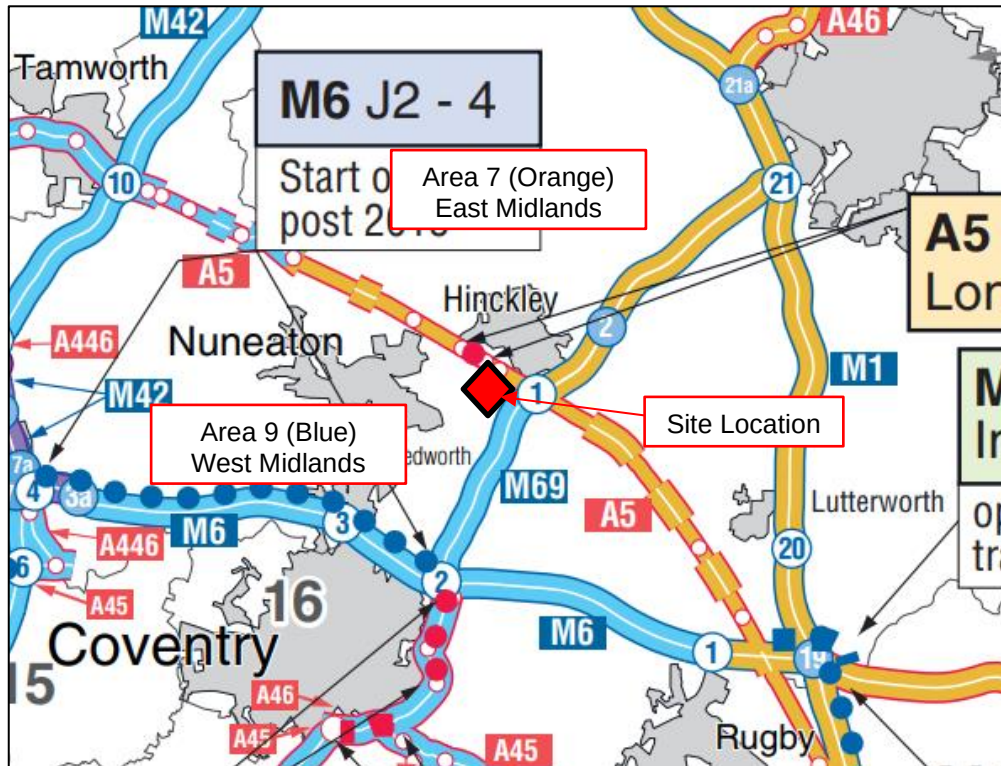
	Car space 0.5% of A	HGV spaces 0.5% of B or 1% of B in areas of need*	Coach = 0.1% of B	Caravan etc = 0.015% of A	Motorcycle = 0.015% of A (min 10)	Disabled Car spaces = 5% of C (Min 5)	1 abnormal load	EV Charging	Total
DfT Circular requirement	210	39	5	6	6	10	1	?	280
Revised Provision April 2024	272	43	6	6	11	17	1	36	392
Revised Difference	62	4	1	-	5	7	-		112

*Estimated based on 0.75% to reflect location between East and West Midlands.

- 2.14 The comparison table indicates that due to the reduction in recorded traffic flows, the number of required car parking spaces would in fact decrease, with the revised parking provision now ensuring that the parking requirements have been met.
- 2.15 NH requested that the number of HGV parking bays should be doubled given the site is located within an 'area of need' for HGV parking. The DfT's Lorry Parking Survey does not provide any criteria for establishing an area of need for HGV parking, but states that the East Midlands currently sits at 92% utilisation of all HGV parking, thus suggesting it is located within an 'area of need' for HGV parking.

- 2.16 It is not made clear within the report from where this data is derived, however it appears to be based on a series of snapshot surveys undertaken on nights during March 2022. The study is not clear on its methodology in terms of the locations of the sites surveyed, or any comparative analysis on this point.
- 2.17 Moreover, the application site is a cross-boundary application which crosses both the East and West Midlands. **Figure 2.3** illustrates the site location in relation to NH's map denoting their Areas 9 (West Midlands) and 7 (East Midlands).

Figure 2.3: National Highways Regions Map



- 2.18 Indeed, the site would primarily cater for eastbound traffic from the M69, coming from the West Midlands, with the HGV parking area itself also located within the West Midlands (within Rugby Council land, who are the lead authority in relation to the application).
- 2.19 Therefore, there would be no requirement to provide double the number of HGV parking spaces on the site, which is also an unfeasible request given the constraints of the site. However, it is acknowledged that some of the site is situated within the East Midlands and that the site may also cater for some traffic heading westbound on the M69 from the East Midlands.
- 2.20 Therefore, a robust approach to HGV parking has been considered that half of the parking requirement should be provided for the East and West Midlands respectively. This would equate to an increase of 50% on the current HGV parking provision, rather than 100%. This is notwithstanding that the majority of the site is located within the

West Midlands, and given the location of the site in relation to the junction it is more likely to serve traffic approaching from the West Midlands.

- 2.21 This is further considered to be robust as the site located to better serve eastbound traffic and the majority of the site is in the West Midlands. An updated site layout plan is provided at **Appendix 3** which demonstrates the increase in HGV parking on the site, which now satisfies the DfT parking requirements on the above basis.

Site Access Arrangements

- 2.22 NH acknowledge that the proposed site access arrangements remain the same as the previously approved access for the extant approval for a TRSA on the site. However, NH state that they will need to determine this access is safe and suitable given the proposals have changed.
- 2.23 DTP provided NH's transport consultants WSP with a copy of the proposed site access arrangements by email in December 2023. A copy of the approved access arrangement is included at **Appendix 5** of this report. The access is identical to the access already approved on the site, with Leicestershire County Council confirming agreement to this in their comments previously referred to.

Abnormal Load Bay

- 2.24 NH state that the MSA should provide an abnormal load bay. The site benefits from extant planning approval for a TRSA (Application Reference Number: 20/00531/HYB), where this TRSA scheme also required an abnormal load bay. On this previous scheme, two HGV bays were allocated for abnormal loads.
- 2.25 The same approach was taken on the current proposals, with two HGV bays allocated as an 'abnormal load bay'. However, given NH's concerns, an abnormal load bay has now been provided and is shown on the plan at **Appendix 3**.
- 2.26 During discussions with NH (in the meeting of 22nd February 2024) it was also requested that a swept path analysis be provided of the site access arrangements for an abnormal load vehicle. NH provided DTP with a link to the stipulated lengths of an abnormal load so that a swept path analysis of this could be undertaken.
- 2.27 An updated swept path analysis is included at **Appendix 4** which provides vehicle tracking for a vehicle 3.5m in width and 20m in length which demonstrates that this vehicle can suitably make use of the proposed site access.

Trip Generation

- 2.28 During the pre-application process it was agreed with NH that the trip generating potential of the proposals was to be assessed based on the TRICS category 'Motorway Service Area', which was undertaken in the submitted TA. NH's consultation response of December 2023 accepted these trip rates. It was thereafter agreed that this TRICS category alone would suffice for an assessment of the site, with no requirement to interrogate the database for trip rates for each land use.
- 2.29 Subsequent to this, NH issued their revised set of comments in February 2024 which now supersede their original acceptance of these trip rates. In their amended response, NH now question the trip rates derived from the TRICS database as the comparative sites identified were not considered a suitably representative sample. In the meeting held with DTP in February 2024, NH suggested using an alternative method of determining trip generation, such as basing this on a turn-in rate of the passing flow of vehicles on the M69.
- 2.30 In the February 2024 meeting, NH discussed with DTP trip generation methodologies that they have previously accepted when assessing proposed motorway service areas. NH provided DTP by email with an assessment undertaken by AECOM and approved by Systra from 2017 for a proposed MSA at Junction 4 of the M42 wherein appropriate turn-in rates were utilised to determine trip generation numbers.
- 2.31 The turn-in rates utilised were based on data obtained from a series of offline MSA facilities which had an average turn-in rate of 4.2% and 4.1% in the AM and PM peak hour periods and an average spacing of 23 miles. This was then factored according to the average spacing between service areas at this particular site was around 19 miles, giving a turn-in rate of 3.6% and 3.5% for the AM and PM peak hour periods, respectively.
- 2.32 The current proposals would see an average spacing of 12.3 miles to the nearest service areas on the M1 and M6 (northbound and southbound), respectively. Therefore, the turn-in rates derived by AECOM have been factored down using the same methodology to provide the following movements when assessed against the recorded traffic flows on the M69 for the peak hour periods in **Table 2.3**.

Table 2.3: Turn-in Rate Trip Generation Assessment

Scenario	Arrivals	AM	PM
Turn-in Rates - Average Comparison	%	4.20%	4.10%
	Tot	171	155
Turn-in Rates - Adjusted for Junction Spacing	%	2.30%	2.30%
	Tot	94	86
TRICS DATA	Tot	106	86
Approved Development	Tot	222	130

- 2.33 The table shows that the adjusted turning rates are almost identical to the TRICS analysis, both of which are significantly lower than the consented trips already approved on the site. Even when using the unadjusted turning rates, the overall number of trips would remain lower than those already consented on site.
- 2.34 It is further noted that given the distance between nearby service areas, increasing the nearby amenity for passing motorists to make use of, the actual turn-in-rates that would be observed at the site may be considerably lower than those detailed above.

Travel Plan

- 2.35 Despite previously accepting the submitted Travel Plan for the site, NH provide revised comments regarding this in their February 2024 comments. The comments state that the no evidence is provided for the baseline of employees arriving by private car. It is stated that staff surveys will establish this baseline once this site is operational. It is also stated that no clear targets are provided, which are outlined at Table 5.1 of the submitted TP.

Summary of Response to Latest Consultation Comments

- 2.36 In terms of the need for an MSA development, on review there is clear policy support for HGV and EV service provision whilst the concept of roadside services supporting the same operation of the SRN already has planning approval in this location.
- 2.37 NH have identified that the site resides in the East Midlands and is therefore located within an 'area of need' for HGV parking. This is based upon the DfT's National Lorry Parking Survey. It is not clear how the criteria for an 'area of need' has been established, the base data in the report is limited in terms of source and it is not demonstrated why particular sites were selected to be surveyed in each region.
- 2.38 We have reviewed and can confirm that the bulk of the application site is situated within the West Midlands region with Rugby Borough Council as the lead planning authority. The HGV spaces are within the West Midlands portion of the site and the site would primarily serve eastbound traffic on the M69 arriving from the West Midlands region.
- 2.39 Even as a worst-case scenario of a 50/50 split between parking requirements for the East and West Midlands areas, the updated site layout plan demonstrates an uplift in HGV parking provision of 50% to reflect this.
- 2.40 In terms of an abnormal load bay, an area has been identified on the updated site layout plan for abnormal loads, with a swept path analysis undertaken for the specification of vehicle requested by NH.

- 2.41 NH have requested use of a turn-in-rate based assessment of trip generation based on an approved methodology from another MSA site. We have used this methodology and applied this to the current proposals, which demonstrate that this approach resulted in a lower trip generation than the TRICS based assessment and continued to be lower than the trip generation already approved on the site.

3 Summary and Conclusions

- 3.1 Dynamic Transport Planning is instructed by Welcome Break to report on the anticipated highways and transportation considerations related with the proposed development of a Motorway Service Area (MSA) off M69 Junction 1, Stretton Point, Hinckley.
- 3.2 The proposed site is subject to a live planning application, submitted in October 2023 (ref. 23/01023/HYB) which received consultation comments provided by NH which were positive. However, NH have subsequently provided further consultation comments contrary to their response, which this TN addresses.
- 3.3 NH stated that the site required double the level of HGV parking given it resided within the 'area of need' of the East Midlands. However, the application site is located on the cross-boundary of both the East and West Midlands, meaning that there would not be a requirement to provide double the level of HGV parking. A revised site layout plan has been provided which includes a total of 43 HGV parking bays.
- 3.4 It was also requested that an abnormal load bay be provided for the site. The site benefits from extant planning approval for a TRSA which also required an abnormal load bay and was provided in the same manner for the current scheme. However, a new marked abnormal load bay has now been included on the revised site layout plan.
- 3.5 NH questioned the suitability of the MSA TRICS category for use in trip generation assessment and instead proposed basing the assessment on a turn-in rate percentage of the passing flow on the M69. The turn-in rate assessment was shown to be similar to the submitted TRICS based assessment, with both remaining well below the number of trips already consented on the site.
- 3.6 Overall, our conclusion remains that, based on the above details and the previously submitted TA, the scheme remains acceptable from a highway's perspective.

Appendix 1

National Highways Pre-Application Advice

Our ref: NH/23/00548

Your Ref:

Jordan Bell
Transport Project Manager
Dynamic Transport Planning Limited
The Riverside, Chester-Le-Street
County Durham
DH3 3QR

Via email: jbell@dynamictransportplanning.co.uk

Sammantha Rose
Assistant Spatial Planner

National Highways
The Cube
199 Wharfside Street
Birmingham
B1 1RN

Tel: 07955-311-350

03 May 2023

Dear Jordan,

Pre-Application on Land at M69, J1, off A5 Watling Street, Hinckley

Thank you for providing National Highways the opportunity to comment on the above-mentioned pre-planning application for a proposed Motorway Service Area (MSA) near Hinckley, Leicestershire.

National Highways (formally Highways England) 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.

In responding to development related consultations, we have regard to the National Planning Policy Framework (NPPF) and DfT Circular 01/2022: The Strategic Road Network and the Delivery of Sustainable Development ('the Circular'). The latter document sets out National Highways policy on sustainable development and our approach to proposals which may have an impact on our network.

The SRN in the vicinity of the proposed development is the A5 trunk road and M69 motorway.

We issued our first response on 20 April 2023 during our process of reviewing the traffic impact and parking numbers of this proposal. This letter serves to provide our feedback on these two aspects.

Traffic Impact

We note the access to the site is proposed to be via a signalised T-junction onto the A5 which is approximately 180m away from the M69 Junction 1. Whilst the access arrangement in this pre-application does not differ from the proposal in the previous planning consent (ref. 20/00531/HYB), we require the site access to be analysed as part of the Transport Assessment. Also, assessments of the M69 Junction 1 and the site access should be carried out to demonstrate any traffic impacts on the SRN, according to the guidance as set out in the Circular 01/2022.

We deem the trip rates for the MSA as shown in Table 2 acceptable. Meanwhile, although the trip generation has been shown as aggregate data in Table 3, we expect the three land uses will be assessed separately. Individual trip rates for each land use (the MSA, HGV Sales Unit, and Drive-thru) are to be utilised to calculate the respective trip generation. Hence, it is unclear how the applicant intends to assess the trip generation for the petrol filling station. We therefore anticipate this to be clarified in the Transport Assessment.

We also note the lack of trip distribution information currently, and thus expect more details would be provided in the Transport Assessment.

Parking Provision

The proposal includes a total of 279 parking bays, including 32 Electric Vehicle (EV) bays, 21 mobility impaired bays and 27 staff parking bays. Also, 28 HGV bays, 8 coach bays and 8 caravan bays are proposed. As such, the proposal meets the requirement of parking for car, HGV, coach, and caravan parking spaces as set out in Annex A: Roadside Facilities Table 2 of the Circular 01/2022. However, the consideration of motorcycle parking appears to be missing in the proposal. According to the DfT requirements, there should be a minimum of 10 motorcycle parking spaces. A masterplan showing all the parking bays and the numbers of proposed parking provision should be provided in the Transport Assessment. We would also require the proposed parking provision to be reviewed once the overall trip generation is updated and agreed.

Summary and Conclusion

Thank you again for providing pre application information on a proposed Motorway Service Area near Hinckley, Leicestershire.

Noting that a meeting between National Highways' Spatial Planning team and your team has been scheduled to take place on 11 May 2023, I hope that the above information is of use in progressing your preparation for our discussion and your planning application.

Yours sincerely,

Sammantha Rose

Sammantha Rose

Midlands Operations Directorate

Email: samm.rose@nationalhighways.co.uk

Appendix 2

National Highways Consultation Responses



National Highways Planning Response (NHPR 22-12) Formal Recommendation to an Application for Planning Permission

From: Andy Jinks (Regional Director)
Operations Directorate
Midlands Region
National Highways
PlanningM@nationalhighways.co.uk

To: Hinckley and Bosworth Borough Council (FAO)
planning@hinckley-bosworth.gov.uk

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

Council's Reference: 23/01023/HYB

Location: Land East Of Stretton Croft Wolvey Road Burbage Leicestershire

Proposal: Construction of motorway service area comprising of vehicular and pedestrian access from the A5, petrol filling station for domestic vehicles, HGV filling station, Main PFS / Services building, drive thru unit, EV charging spaces, customer parking spaces including HGV, coach and caravan provision, landscaping including picnic and dog walking areas, electric substations and retaining walls at south/western boundary fronting the M69 (Cross boundary application with Rugby Borough Council)

National Highways Ref: NH/23/03516

Referring to the consultation on a planning application dated 6 November 2023 referenced above, in the vicinity of M69 and A5 that forms part of the Strategic Road Network, notice is hereby given that National Highways' formal recommendation is that we:

- ~~a) offer no objection (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 not propose 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 PlanningM@nationalhighways.co.uk.

Signature:

Date: 19 December 2023



Name: Babatunde Adekoya-Serrano

Position: Assistant Spatial Planner

National Highways
199 Wharfside Street,
Birmingham, B1 1RN

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.

Development Proposal

Construction of motorway service area comprising of vehicular and pedestrian access from the A5, petrol filling station for domestic vehicles, HGV filling station, Main PFS / Services building, drive thru unit, EV charging spaces, customer parking spaces including HGV, coach and caravan provision, landscaping including picnic and dog walking areas, electric substations and retaining walls at south/western boundary fronting the M69 (Cross boundary application with Rugby Borough Council)

Thank you for consulting National Highways regarding the above proposals. We have undertaken a review of the Transport Assessment submitted by Dynamic Transport Planning (DTP) on behalf of the applicant Welcome Break, and have set out our thoughts as follows:

The proposed development seeks a Motorway Service Area (MSA) off M69 Junction 1, Stretton Point, Hinckley. The MSA is broken down into the following components:

- 1,720sqm GFA associated building with drive thru lane provision (MSA).
- 12-bay petrol filling station with additional HGV filling bays (PFS).
- 73sqm GFA HGV Fuel Sales area.
- 170sqm GFA Drive-thru coffee shop.

It is stated that the site currently has approval for a roadside services area, offices, and industrial unit (ref. 20/00531/HYB) which would result in a total of 333 and 368 two-way vehicle movements during the AM and PM peak-hours, respectively. However, it is understood that this gained a planning consent in 2020 and as such conditions may have changed on the network since the analysis in support of that application, and therefore a new assessment is required to ensure that these current proposals can be safely accommodated on the network.

We can then comment upon the details within the supporting Transport Assessment as follows.

Proposed Trip Generation and Distribution

DTP have utilised TRICS to derive trip rates for the development, selecting land use 'Hotel, Food and Drink', and sub land use – 'Motorway Service Areas'. This category has been utilised for the MSA (1,720sqm), HGV sales area (73sqm) and Drive-Thru (170sqm).

Table 6.2 states that during the weekday there are 204 and 170 two-way vehicle movements during the AM and PM peak-hours, respectively. On Saturdays, there are 270 and 406 two-way vehicle movements during the AM and PM peak-hours, respectively, as presented in Table 6.5. We have undertaken a review of the trip distribution as set out in Section 6.3. Based on the nature of the development proposals, this approach appears reasonable and is therefore accepted.

It is expected that the MSA will have most of its associated trips originate from existing traffic on the M69 mainline. However, whilst the level of car parking has been derived in accordance with Circular 01/2022, this should be checked against a daily trip profile based upon the TRICS data used to ensure that both the predicted trip generation and levels of car parking are consistent.

Traffic Impacts

DTP have undertaken capacity assessments of the M69 J1 roundabout. The Model results for all assessment scenarios are summarised in Table 7.4, although we would request access to the LinSig Model to conduct an audit and review the outcomes presented within the TA.

Our previous response requested a merge/diverge assessment undertaken for the M69 slip roads. Merge/diverge diagrams have been provided and are contained in Appendix 7, although the opening year will need to be confirmed with 2023 stated rather than 2033. With DTP considering that the results show that the merges are Type D and the diverges Type A, and given that the M69 already has three lanes, the merges can be considered as Type A. However, we would require further information and analysis to be provided and would wish to understand whether the addition of the development traffic requires a step change in layout when compared to the base scenario, and this should be provided.

It is welcomed that the application is supported by a Travel Plan (TP) and that the details set out in Chapter 7 of the TP includes measures to reduce single occupancy car trips and ongoing monitoring, thus mitigating traffic impacts where possible.

Clarification on the agreed layout from your previous granted planning permission will needs to be provided as the layout has not been confirmed as acceptable in traffic impact terms.

Summary

We would accept the trip generation as given, although this will need to be verified against the level of car parking provision. NH requests access to the LinSig Model to review the model against outcomes presented in the TA.

I hope that the above is clear and if the supporting LINSIG model can be provided we will be able to finalise our review.

National Highways welcomes any further correspondence with the applicant to work continuously and collaboratively.

Considering the above, National Highways recommends that planning permission not be granted for a period of three months from the date of this notice.

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 73 and 105 prescribing that significant development should offer a genuine choice of transport modes, while paragraphs 104 and 110 advise that appropriate opportunities to promote walking, cycling and public transport should be taken up.

Moreover, the build clever and build efficiently criteria as set out in clause 6.1.4 of [PAS2080](#) promote the use of low carbon materials and products, innovative design solutions and construction methods to minimise resource consumption.

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.



National Highways Planning Response (NHPR 22-12) Formal Recommendation to an Application for Planning Permission

From: Andy Jinks (Regional Director)
Operations Directorate
Midlands Region
National Highways
PlanningM@nationalhighways.co.uk

To: Hinckley Borough Council; and Rugby Borough Council

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

Hinckley & Bosworth Borough Council Reference: 23/01023/HYB
Rugby Borough Council Reference: R23/1047

Location: Land East of Stretton Croft, Wolvey Road, Burbage, Leicestershire, LE10 3JB

Proposal: Construction of motorway service area (MSA) comprising of vehicular and pedestrian access from the A5, petrol filling station for domestic vehicles, HGV filling station, Main PFS / Services building, drive thru unit, EV charging spaces, customer parking spaces including HGV, coach and caravan provision, landscaping including picnic and dog walking areas, electric substations and retaining walls at south/western boundary fronting the M69 (Cross boundary application)

National Highways Ref (HBBC): NH/23/03562
National Highways Ref (RBC): NH/24/04508

Referring to the consultation on a planning application referenced above, in the vicinity of the **M69 Motorway and A5 trunk road** that form part of the Strategic Road Network, notice is hereby given that National Highways' formal recommendation is that we:

- ~~a) offer no objection (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 not propose 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 PlanningM@nationalhighways.co.uk.

Signature:

Date: 19 February 2024

Name: Catherine Townend

Position: Spatial Planner

National Highways

The Cube | 199 Wharfside Street | Birmingham | B1 1RN

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

Annex A National Highway's assessment of the proposed development

This response represents our formal recommendations and has been prepared by Catherine Townend, Spatial Planner for National Highways. **It provides an update to our previous response of 14 February and includes some changes to our position with reference to parking provision and trip generation.**

National Highways (formally Highways England) 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.

National Highways considers planning applications for new developments under the requirements of the National Planning Policy Framework (NPPF) and DfT Circular 01/2022: The Strategic Road Network and The Delivery of Sustainable Development ("the Circular"). The latter document sets out our policy on sustainable development and our approach to proposals which may have an impact on our network.

The SRN in the vicinity of the proposed development is the M69 Motorway and A5 trunk road.

Development Proposal

The Site, measuring 10.36 hectares of undeveloped land straddles the administrative boundaries of Hinckley & Bosworth Borough and Rugby Borough Councils. It is located immediately to the northwest of the M69 Junction 1 circulatory and A5 interchange (sometimes referred to as Stretton Baskerville junction). The Site shares a common boundary with the M69 northbound exit slip road, the junction circulatory (roundabout), and the A5 northbound carriageway.

National Highways understands that Full planning permission is sought by Welcome Break as the Applicant/Landowner for the construction of a motorway service area (MSA) to serve users of the M69 motorway. Access into the Site however, is located on the adjacent A5 trunk road.

According to the Transport Assessment (dated August 2023) the proposal for the MSA consists of:

- 10 x petrol/diesel pumps to serve domestic vehicles
- 2 x HGV fuel pumps and separate HGV sales building
- A principal retail / amenity building comprising a variety of food retail outlets and customer toilets/showers
- A Separate Drive-thru Coffee Shop
- Parking for 269 cars/LGVs including 36 electric vehicle (EV) charging bays, and 17 mobility impaired parking bays.

- An additional 29 HGV parking bays, 6 coach parking bays, 8 caravan parking bays and 11 motorcycle parking bays.

Background

The Site currently benefits from (unimplemented) planning approval for a roadside (trunk road) services and employment site.

Hybrid Planning Permissions LPA Ref's R20/0422 (Rugby Borough Council) and LPA Ref. 20/00531/HYB (Hinckley and Bosworth), approved in August 2022, allowed for the provision of a mixed-use development including a roadside facility comprising a petrol filling station, drive through restaurant (Class A1/A3/A5 (now Class E)) with new vehicular access (via A5 Watling Street), together with internal roads, car/cycle parking at the Site. The Hybrid planning application also included Outline consent for the erection of class B1 and flexible class B1/B2/B8 units with access via the A5.

We acknowledge that this planning application makes reference to the planning permission mentioned above. However, whilst this proposal contains some similarities with the existing proposal, there are fundamental differences between a trunk road (i.e. A5) roadside facility and a motorway service area. As such, this planning proposal will be assessed on its own merits.

Need for a Motorway Service Area

Roadside facilities perform an important safety function by providing opportunities for the travelling public to stop and take a break during the course of their journey. Government advice is that motorists should stop and take a break of at least 15 minutes every two hours.

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. On this basis, the maximum distance between signed motorway service areas should be 28 miles. In locations on the SRN where drivers would have to drive in excess of 28 miles between roadside facilities, a need for a new MSA can be established.

It is for the promoters of new facilities to demonstrate to the determining authority that a need for a new facility at the proposed location exists. There are currently no motorway service areas serving the M69 motorway. However, this does not automatically denote the need for such a facility. As referenced in the Applicant's Planning Statement, the closest existing services to the Site comprise the M1 Leicester Forrest East Services (12 miles from the Site) and the M6 Corley Services (14 miles from the Site).

Given that the above-mentioned services are within 28 miles of the Site, a need for a new MSA at this location has not been demonstrated by the Applicant based on the 28-mile criteria.

Notwithstanding the above, it is recognised that on certain parts of the SRN, 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. As such, in areas where there is an identified need for HGV parking (informed by [DfT's National Lorry Parking Survey](#)), the maximum distance between facilities providing HGV parking should be no more than 14 miles.

The Applicant has demonstrated that the proposed development is in excess of 14 miles from the nearest MSA but has given no indication of the distance to all types of motorway HGV parking facilities (being service areas, rest areas or truckstops). Whilst DfT's Lorry Parking Survey *does* indicate that the East Midlands is in critical need of more HGV parking, the Applicant should identify the distances to the nearest HGV parking based on all type of HGV parking facilities.

It can be noted that the distance between services can be shorter (there is no minimum distance), meaning that National Highways would not object to proposals that have not demonstrated a need. However, to protect the safety and operation of the SRN, the access/egress arrangements of facilities must comply with the design requirements as set out in the Design Manual for Roads and Bridges (DMRB) which includes provisions in respect of junction separation.

Minimum Requirements for a Motorway Service Area

All roadside facilities that are accessed directly from a motorway or motorway junction must be signed for safety reasons. DfT Circular 01/2022 (Annex A, Table 1) sets out the minimum requirements that these facilities must meet to be eligible for signing.

National Highways will not support proposals for roadside facilities adjacent to a junction with a motorway that would not meet the minimum requirements for signing as these can prevent or reduce the provision of more appropriate facilities.

On-line (between junctions) service areas are preferred by National Highways because they are more accessible to users of the SRN and as a result more conducive to encouraging drivers to stop and take a break. In addition, they also help to avoid an increase in traffic demand at junctions with all-purpose roads.

However, where an on-line service area cannot be delivered due to planning, safety, operational or environmental constraints, the development of a site that shares a common boundary with the highway at a junction with the SRN, and which provides the mandatory requirements to be eligible for signing is preferred to the continued absence of facilities.

The proposed development can be classed as an off-line motorway service area as it is not located between junctions but at an existing junction (M69 Junction 1). As the Site shares a common boundary with the highway at a junction with the SRN, its location would meet the criteria for a signed motorway service area providing that the minimum requirements for an MSA are also met.

As per DfT Circular 01/2022, as a minimum, motorway service areas must:

- Be open 24 hours per day, 365 days per year;
- Include free parking for a minimum of 2 hours for all vehicles;
- Include provision of security monitoring equipment including appropriate lighting and CCTV systems;
- Have free-to-use toilets with hand washing facilities, and at least 1 changing places toilet and 1 for people with disabilities;
- Include shower and washing facilities for HGV drivers (separate provision for men and women);
- Include the provision of fuel for petrol and diesel vehicles and EV chargepoints;
- Serve hot drinks and cooked hot food for purchase during all opening hours and for consumption on the premises;
- Include access to a free-of-charge telephone for emergency use, Wi-Fi and power points available for device charging;
- Have adequate levels of parking for different vehicle types supported by a demand-based calculation (DfT Circular 01/2022, Annex A Table 2).

National Highways has reviewed the submitted documents to ascertain if the proposal meets the minimum requirement for an MSA. Following this review, we consider that further information is required as set out below:

Fuel Provision

The proposed Site Layout Drawing (ref 1415-23 revision K) indicates the site layout including access point, amenity building, drive through, parking areas, and HGV fuelling area. It is believed that the fuelling area for domestic vehicles is located to the southeast of the Site, however, this is not labelled. Given that the provision of fuel is a mandatory requirement for MSAs, the location of this component should be clearly identified.

CCTV and Lighting

As above, the Site Layout Drawing should be updated to identify locations for the provision of security monitoring equipment (i.e. CCTV) and lighting.

Parking Provision

The proposal includes the provision of a total of 269 parking bays for cars and light goods vehicles. This includes 36 EV charging bays and 17 disabled bays. 11 dedicated staff parking bays are included in this number. In addition to this number, the proposal includes, 10 motorcycle bays, 29 HGV bays, 8 caravan bays, and 6 coach bays.

DfT Circular 01/2022 Annex A, Table 2 sets out the minimum required parking provision for different vehicle types which should be calculated based on a proportion of mainline motorway traffic flows for which the development would serve. In calculating this, the most recent complete year data should be used to identify the

peak monthly traffic flow, which should then be averaged to find the daily flow for the different vehicle types.

According to Page 20 of the Transport Assessment, the Applicant has used the latest traffic flow data from the nearest DfT count point on the M69 (count point 46056), to calculate the minimum required number of spaces. National Highways still needs to review the flow data used to confirm it conforms with DfT Circular 01/2022.

Notwithstanding the above, we have noted that HGV parking provision has been calculated based on a standard rate. However, DfT Circular 01/2022 states that in areas of need for HGV parking, a higher rate should be used to calculate the parking provision for HGVs. As DfT's Lorry Parking Survey indicates that the East Midlands is an area of need for HGV parking, the higher rate should be used in this case.

In light of the above, HGV provision proposed with this application is insufficient.

It is further understood that the Site will employ approximately 120 members of staff, however only 11 dedicated staff parking bays are proposed. National Highways will need to be sure that the level of proposed parking is sufficient to cater for both road users and staff, and therefore further detail is required to understand the maximum staffing number at any one day, and the anticipated requirement for staff parking. In light of this, we request the Applicant provide additional information to support staff parking provision.

Finally, it should be noted that MSAs must include parking provision for a least one [abnormal load](#). This provision is not clearly identified on the Site Layout Drawing and not referred to the Transport Assessment.

In light of the above comments, changes to this application are needed to demonstrate that the proposed development meets the minimum requirement for a motorway service area in accordance with DfT Circular 01/2022.

Site Layout

Given the Site is accessed directly from the SRN, National Highways will need to consider the layout of the Site to ensure that any conflict points or congestion within the Site will not result in queuing back onto the SRN. National Highways will undertake this review following receipt of an updated Site Layout Drawing (to address our previous comments).

Access

According to the Transport Assessment and Site Layout drawing, access to the Site for vehicles and pedestrians is proposed to be taken from the A5 Watling Street approximately 170m south of Wolvey Road (south) junction and 200m north of the Stretton Baskerville Interchange (M69 Junction 1). The A5 Watling Street at this location is subject to the national speed limit (60mph).

The proposed Site Access is in the same location to that approved under the previous planning consent for a petrol filling station. However, given that the development proposal has since changed, National Highways will need to determine that the proposed access is safe and suitable for the development being proposed.

Whilst details of the Site access is described in the Transport Assessment, a drawing detailing the full extents of the access proposals has not been provided. The submission of this drawing is a key item for consideration of this planning application, and we would request that it is uploaded to the planning portal and appended to the Transport Assessment. It should be noted that National Highways expects highway drawings to be designed to a preliminary standard in accordance with the Design Manual for Roads and Bridges (DMRB).

Notwithstanding the above, we have viewed drawing SK004 revision C '*Potential Access Arrangements O4 Swept Path Analysis 16.5m Articulated Vehicle*' and may have initial concerns with the proposed layout. In addition, given that the Site must also be able to accommodate abnormal loads to meet the minimum requirement for an MSA, swept path analysis must demonstrate that the Site access and internal layout can safely accommodate the movement of abnormal loads without detriment to the safety of oncoming vehicles.

Removal of Layby

The proposed access scheme will require the removal of a an A5 layby. The principle of the removal of the layby is acceptable to National Highways given that provision for HGV parking will be provided within the MSA Site. However, the two spaces removed from the layby, should be compensated within the overall parking provision of the MSA. As such, two additional HGV parking spaces should be added to the total number of HGV parking spaces needed to satisfy DfT Circular, Annex A, Table 2.

Traffic Impacts

Trip Generation

As per DfT Circular 01/2022, roadside facilities should be well-designed to serve passing traffic. Off-line MSAs can divert traffic onto the nearest junction and surrounding roads increasing the volume of traffic at those locations, whilst there is also a risk to them becoming destinations in their own right. This can adversely affect the safety and operation of the surrounding highway network and consequently the Transport Assessment must show that there would only be a minimal overall increase in trip mileage and that road safety is not compromised.

Given that the current proposal includes signage from the M69 motorway (not part of the existing planning consent), the demand for this roadside facility will increase compared to the previously proposed trunk road services (signed from the A5 only), although it is noted that the previous planning consent included an element of B1/B2/B8 employment use which is now not being proposed.

The Transport Assessment sets out the anticipated vehicular trip generation for the proposal which has utilised TRICS to derive trip rates for the development, selecting land use 'Hotel, Food and Drink', and sub land use – 'Motorway Service Areas'. This category has been utilised for the MSA (1,720sqm), HGV sales area (73sqm) and Drive-Thru (170sqm).

The TRICS category used was based on the advice of National Highways, however, upon reviewing the TRICS outputs it appears that the sample does not appear representative of MSAs within the Midlands region. We have additional concerns with the trip generation calculation method which we feel could have led to trip generation for this proposal being understated. We have shared these observations directly with the transport consultant for the applicant and are awaiting clarification.

In light of above, we consider that trip generation is not agreed at this time.

We will consider the appropriateness of trip distribution once we are satisfied with the above.

Junction Capacity Assessments

It is noted the Transport Assessment includes a capacity assessment of the M69 Junction 1 Circulatory and Site Access undertaken in LinSig. National Highways will wish to verify the suitability of the model and so will be requesting a copy of the LinSig for review before we review the outputs. However, we will only undertake a review of the LinSig once we have accepted the trip generation and distribution.

Notwithstanding the above, we note that traffic surveys were undertaken on Thursday 18th May and Saturday 20th May to establish current traffic levels at the junction. Whilst this is considered to be a neutral month, we would recommend a weeks' worth of ATCs to make sure that the day chosen is representative of the traffic over a week.

M69 Merge/Diverge Assessment

During pre-application discussions with the Applicant, we advised that the layout of the M69 junction 1 exit (diverge) and entrance (merge) points would need to be reviewed to ensure they remain sufficient following any increase in vehicles using them. This is called a merge/diverge assessment and DMRB Chapter CD122 *Geometric Design of Grade Separated Junctions* sets out the method for calculating the most appropriate layouts.

We noted that Merge/diverge diagrams have been provided by the Applicant in Appendix 7 of the Transport Assessment. However, it is necessary to understand whether the increase in traffic using the merge/diverge (as a result of the proposed development) would require a step change in layout compared to the current design. This is unclear from the information submitted and should therefore be provided.

Off Site Highways Mitigation

Until the above outstanding points have been addressed, it is unclear whether there will be a need for any additional off-site highways mitigation above and beyond those discussed in the Transport Assessment nor whether the proposed changes to the SRN are acceptable.

The Applicant should note that for National Highways to consider the acceptability of physical changes to the SRN, prior to planning consent, proposed changes must be:

- Designed to a preliminary design standard in accordance with the Design Manual for Roads and Bridges (DMRB);
- Have completed a Walking, Cycling, Horse-Riding Assessment and Review (WCHAR) in accordance with GG142 of DMRB;
- Have undergone National Highways design checks;
- Have obtained Agreement in Principle (AiPs) for any Departures from Standard;
- Have completed a Stage 1 Road Safety Audit (RSA) in accordance with GG119 of DMRB;
- Have any identified safety risks managed through the completion of a Safety Risk Assessment in accordance with GG104 (applicable in certain circumstances only).

National Highways has not been consulted on preliminary drawings for any of the proposed physical changes to our network. As such, the Applicant will need to submit these drawings to be uploaded to the planning portal for transparency. Such drawings relate to the Site access design, proposed changes to the A5 carriageway and the proposed changes to the Wolvey Road junction as mentioned in the Transport Assessment.

Any additional changes to the SRN identified following capacity assessments will need to be follow the same process.

Boundary Impacts

The Site shares a common boundary with the A5 and M69 motorway. As this is understood to be a Full planning application, potential boundary matters must be addressed at this stage. National Highways has therefore considered the proposed development in relation to any potential boundary impacts on our network and assets and we can set out these comments as follows:

Drainage

Drainage of this Site is of particular interest to National Highways to ensure that surface water run-off from the site does not threaten the integrity of National Highways drainage assets. As set out in Paragraph 59 of DfT Circular 01/2022, National Highways will not accept any water run-off arising from any change of use into our highway drainage systems, or any new connections into those systems from third party development drainage systems. Upon a high-level review of the drainage strategy, National Highways does not have any objections to the drainage proposals although we are awaiting additional comments from our drainage team which we will supply in due course.

Geotechnical

Any excavation and/or landscaping works has the potential to undermine the integrity and stability of the adjacent highway network. As such, if excavation works are within 10 metres of our boundary, prior to the commencement of any excavation (including in relation to landscaping), it would be necessary to set out how geotechnical risks will be identified and managed. This would be undertaken in accordance with Chapter CD122 of the Design Manual for Roads and Bridges (DMRB) and would need to be submitted for our review and approval.

Similarly, it is noted with reference to the Site Layout drawing that a retaining wall is proposed within the southeast corner of the Site. This appears to be within 10 metres of the boundary with our land and as such, further details pertaining to the retaining wall should be submitted for National Highways consideration.

In addition, further information may be required with reference to *BS5837: 2012 Trees in relation to design, demolition and construction*. This is to ensure that our tree stock and associated root systems are protected.

We will provide additional comments from our geotechnical team in due course.

Boundary Treatments and Landscaping

National Highways should be consulted on a boundary treatment and landscaping plan which should clearly set out any proposed boundary treatments and landscaping work near to our network. The distance of proposals (in metres) from our network should be clearly identified. All boundary treatments and landscaping should be positioned entirely within the red line boundary of the site and far enough within the site that it can be installed and maintained without encroachment onto National Highways land. This applies to fences and all vegetation for the duration of their life. If landscaping or boundary treatments are in excess of 10 metres from our boundary (this is our land boundary, not the carriageway), it is usually the case that no further information is required, although the Applicant may need to demonstrate that the distance is sufficient. Where landscaping etc is within 10 metres of our boundary, further details will need to be provided for National Highways approval. For instance, some plants are particularly invasive and can pose a threat to our own vegetation and assets.

We note that a landscaping plan (Drawing 1, revision C) has been submitted which details the spacing and variety of plants to be used. We will provide additional comments on this plan once it has been reviewed by our environmental team.

Lighting

Any external lighting schemes have the potential to cast a glare on the adjacent highway causing a road safety hazard. As such, National Highways should be consulted on the details any external lighting schemes. We are content however that this could be managed through suitably worded planning conditions.

Construction Impact

Given the proximity of the Site to our network, National Highways should be consulted on a Construction Traffic Management Plan (CTMP) which could be produced as part of a wider Construction Environmental Management Plan (CEMP). This should clearly set out the numbers and routing of construction traffic, with details of measures taken to ensure that construction traffic has the least impact on the surrounding highway network. We are content however that this could be managed through suitably worded planning conditions.

Off-Site Signage

As per DfT Circular 01/2022 Annex A, roadside facilities that are to be signed from a motorway or motorway junction must meet the minimum requirements for a roadside facility (as mentioned above). Assuming the minimum requirements can be met, it will be a condition of any planning consent that a signage strategy for all new, modified or re-located signs on the trunk road and motorway network is undertaken and approved. Road signs must be designed in accordance with Traffic Signs Regulations and General Directions (TSRGD) and approved by National Highways signage specialists. Other approvals would also be required in relation to signage installation. This is likely to include but not be limited to a Road Safety Audit carried out in accordance with the Design Manual for Roads and Bridges (DMRB). National Highways is usually content for the requirement for a signage strategy to be completed following planning consent. As such, assuming other matters can be resolved, National Highways will be recommending this as a planning condition.

Travel Plan

We have undertaken a high-level review of the Travel Plan and can make the following comments:

Government guidance states that Travel Plans should contain information concerning the nature of the proposed development and the forecast level of trips by all modes of transport likely to be associated with the development.

Whilst the Transport Assessment contains the trip generation for road users, this has not identified the trip generation for staff for which the Travel Plan should be aimed at. As such, the Travel Plan should identify the likely trip generation for employees. This has not been evidenced. Evidence should be provided to demonstrate the number/proportion of employees likely to arrive by private car, setting a baseline for which travel plan targets can be measured against. The Travel Plan fails to do this. This should be clear from the outset to ensure that parking used by staff does not deduct from the total number of parking spaces needed to serve road users.

The Travel Plan contains no clear targets. Government guidance Travel Plans should identify specific required outcomes, targets and measures. Justification for specific targets should also be given.

The Plan offers no clear measures or incentives for reducing travel by private car. The Plan indicates that secure cycle spaces will be provided within the Site, however this is not shown on the Site Layout Drawing.

Summary and Recommendation

In summary, insufficient information has been submitted with this planning application to demonstrate that the proposal is acceptable to National Highways as the highway authority for the M69 motorway and A5 trunk road.

In light of the above, we recommend that this application not be determined for a period of six months from the date of this letter. This is to give the Applicant sufficient time to provide the outstanding information as requested.

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 73 and 105 prescribing that significant development should offer a genuine choice of transport modes, while paragraphs 104 and 110 advise that appropriate opportunities to promote walking, cycling and public transport should be taken up.

Moreover, the build clever and build efficiently criteria as set out in clause 6.1.4 of [PAS2080](#) promote the use of low carbon materials and products, innovative design solutions and construction methods to minimise resource consumption.

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.



National Highways Planning Response (NHPR 22-12) Formal Recommendation to an Application for Planning Permission

From: Andy Jinks (Regional Director)
Operations Directorate
Midlands Region
National Highways
PlanningM@nationalhighways.co.uk

To: Hinckley Borough Council; and Rugby Borough Council

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

Hinckley & Bosworth Borough Council Reference: 23/01023/HYB
Rugby Borough Council Reference: R23/1047

Location: Land East of Stretton Croft, Wolvey Road, Burbage, Leicestershire, LE10 3JB

Proposal: Construction of motorway service area (MSA) comprising of vehicular and pedestrian access from the A5, petrol filling station for domestic vehicles, HGV filling station, Main PFS / Services building, drive thru unit, EV charging spaces, customer parking spaces including HGV, coach and caravan provision, landscaping including picnic and dog walking areas, electric substations and retaining walls at south/western boundary fronting the M69 (Cross boundary application)

National Highways Ref (HBBC): NH/23/03562
National Highways Ref (RBC): NH/24/04508

Referring to the consultation on a planning application referenced above, in the vicinity of the **M69 Motorway and A5 trunk road** that form part of the Strategic Road Network, notice is hereby given that National Highways' formal recommendation is that we:

- ~~a) offer no objection (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 not propose 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 PlanningM@nationalhighways.co.uk.

Signature:

Date: 14 February 2024



Name: Catherine Townend

Position: Spatial Planner

National Highways

The Cube | 199 Wharfside Street | Birmingham | B1 1RN

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

Annex A National Highway's assessment of the proposed development

This response represents our formal recommendations and has been prepared by Catherine Townend, Spatial Planner for National Highways. **It replaces all previous National Highways responses in respect of Hinckley & Bosworth Borough Council reference 23/01023/HYB and Rugby Borough Council reference R23/1047.**

National Highways (formally Highways England) 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.

National Highways considers planning applications for new developments under the requirements of the National Planning Policy Framework (NPPF) and DfT Circular 01/2022: The Strategic Road Network and The Delivery of Sustainable Development ("the Circular"). The latter document sets out our policy on sustainable development and our approach to proposals which may have an impact on our network.

The SRN in the vicinity of the proposed development is the M69 Motorway and A5 trunk road.

Development Proposal

The Site, measuring 10.36 hectares of undeveloped land straddles the administrative boundaries of Hinckley & Bosworth Borough and Rugby Borough Councils. It is located immediately to the northwest of the M69 Junction 1 circulatory and A5 interchange (sometimes referred to as Stretton Baskerville junction). The Site shares a common boundary with the M69 northbound exit slip road, the junction circulatory (roundabout), and the A5 northbound carriageway.

National Highways understands that Full planning permission is sought by Welcome Break as the Applicant/Landowner for the construction of a Motorway Service Area (MSA) to serve users of the M69 motorway. Access into the Site however, is located on the adjacent A5 trunk road.

According to the Transport Assessment (dated August 2023) the proposal for the MSA consists of:

- 10 x petrol/diesel pumps to serve domestic vehicles
- 2 x HGV fuel pumps and separate HGV sales building
- A principal retail / amenity building comprising a variety of food retail outlets and customer toilets/showers
- A Separate Drive-thru Coffee Shop
- Parking for 269 vehicles including 36 electric vehicle (EV) charging bays, 17 mobility impaired parking bays, 29 HGV parking bays, 6 coach parking bays, 8 caravan parking bays and 11 motorcycle parking bays.

Background

The Site currently benefits from (unimplemented) planning approval for a roadside (trunk road) services and employment site.

Hybrid Planning Permissions LPA Ref's R20/0422 (Rugby Borough Council) and LPA Ref. 20/00531/HYB (Hinckley and Bosworth), approved in August 2022, allowed for the provision of a mixed-use development including a roadside facility comprising a petrol filling station, drive through restaurant (Class A1/A3/A5 (now Class E)) with new vehicular access (via A5 Watling Street), together with internal roads, car/cycle parking at the Site. The Hybrid planning application also included Outline consent for the erection of class B1 and flexible class B1/B2/B8 units with access via the A5.

We acknowledge that this planning application makes reference to the planning permission mentioned above. However, whilst this proposal contains some similarities with the existing proposal, there are fundamental differences between a trunk road (i.e. A5) roadside facility and a Motorway Service Area. As such, this planning proposal will be assessed on its own merits.

Need for a Motorway Service Area

Roadside facilities perform an important safety function by providing opportunities for the travelling public to stop and take a break during the course of their journey. Government advice is that motorists should stop and take a break of at least 15 minutes every two hours.

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. On this basis, the maximum distance between signed motorway service areas should be 28 miles. In locations on the SRN where drivers would have to drive in excess of 28 miles between roadside facilities, a need for a new MSA can be established.

It is for the promoters of new facilities to demonstrate to the determining authority that a need for a new facility at the proposed location exists. There are currently no Motorway Service Areas serving the M69 motorway. However, this does not automatically denote the need for such a facility. As referenced in the Applicant's Planning Statement, the closest existing services to the Site comprise the M1 Leicester Forrest East Services (12 miles from the Site) and the M6 Corley Services (14 miles from the Site).

Given that the above-mentioned services are within 28 miles of the Site, a need for a new MSA at this location has not been demonstrated by the Applicant based on the 28-mile criteria.

Notwithstanding the above, it is recognised that on certain parts of the SRN, 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. As such, in areas where there is an identified need for HGV parking (informed by DfT's National Lorry Parking Survey), the maximum distance between motorway facilities providing HGV parking should be no more than 14 miles.

The Applicant has demonstrated that the proposed development is in excess of 14 miles from the nearest MSA but has given no indication of the nearest HGV parking facilities. The Applicant should refer to DfT's Lorry Parking Survey to determine whether there is considered to be a need for HGV parking in this broad location.

It can be noted that the distance between services can be shorter (there is no minimum distance), meaning that National Highways would not object to proposals that have not demonstrated a need. However, to protect the safety and operation of the SRN, the access/egress arrangements of facilities must comply with the design requirements as set out in the Design Manual for Roads and Bridges (DMRB) which includes provisions in respect of junction separation.

Minimum Requirements for a Motorway Service Area

All roadside facilities that are accessed directly from a motorway or motorway junction must be signed for safety reasons. DfT Circular 01/2022 (Annex A, Table 1) sets out the minimum requirements that these facilities must meet to be eligible for signing.

National Highways will not support proposals for roadside facilities adjacent to a junction with a motorway that would not meet the minimum requirements for signing as these can prevent or reduce the provision of more appropriate facilities.

On-line (between junctions) service areas are preferred by National Highways because they are more accessible to users of the SRN and as a result more conducive to encouraging drivers to stop and take a break. In addition, they also help to avoid an increase in traffic demand at junctions with all-purpose roads.

However, where an on-line service area cannot be delivered due to planning, safety, operational or environmental constraints, the development of a site that shares a common boundary with the highway at a junction with the SRN, and which provides the mandatory requirements to be eligible for signing is preferred to the continued absence of facilities.

The proposed development can be classed as an 'off-line' motorway service area as it is not located between junctions but at an existing junction (M69 Junction 1). As the Site shares a common boundary with the highway at a junction with the SRN, its location would meet the criteria for a signed Motorway Service Area providing that the minimum requirements for an MSA are also met.

This sets out that MSAs must:

- Be open 24 hours per day, 365 days per year;
- Include free parking for a minimum of 2 hours for all vehicles;
- Include provision of security monitoring equipment including appropriate lighting and CCTV systems;
- Have free-to-use toilets with hand washing facilities, and at least 1 changing places toilet and 1 for people with disabilities;
- Include shower and washing facilities for HGV drivers (separate provision for men and women);
- Include the provision of fuel for petrol and diesel vehicles and EV chargepoints;
- Serve hot drinks and cooked hot food for purchase during all opening hours and for consumption on the premises;
- Include access to a free-of-charge telephone for emergency use, Wi-Fi and power points available for device charging;
- Have adequate levels of parking for different vehicle types supported by a demand-based calculation (DfT Circular 01/2022, Annex A Table 2).

National Highways has reviewed the submitted documents to ascertain if the proposal meets the minimum requirement for an MSA. Following this review, we consider that further information is required as set out below:

Fuel Provision

The proposed Site Layout Drawing (ref 1415-23 revision K) indicates the site layout including access point, amenity building, drive through, parking areas, and HGV fuelling area. It is believed that the fuelling area for domestic vehicles is located to the southeast of the Site, however, this is not labelled. Given that the provision of fuel is a mandatory requirement for MSAs, the location of this component should be clearly identified.

CCTV and Lighting

As above, the Site layout drawing should be updated to identify locations for the provision of security monitoring equipment (i.e. CCTV) and lighting.

Parking Provision

The proposal includes the provision of a total of 269 parking bays. This includes 36 EV charging bays, 17 disabled bays, 10 motorcycle bays, 29 HGV bays, 11 dedicated staff parking bays, 8 caravan bays, and 6 coach bays.

DfT Circular 01/2022 Annex A, Table 2 sets out the minimum required parking provision for different vehicle types which should be calculated based on a proportion of mainline motorway traffic flows for which the development would serve (in this case, the M69). In calculating this, the most recent complete year data should be used to identify the peak monthly traffic flow, which should then be averaged to find the daily flow for the different vehicle types.

According to Page 20 of the Transport Assessment, the Applicant has used the latest traffic flow data from the nearest DfT count point on the M69 (count point 46056), to calculate the minimum required number of spaces. The traffic flow data that was used to inform this calculation should be submitted to National Highways so that it can be independently verified to confirm it conforms with DfT Circular 01/2022.

It is understood that the Site will employ approximately 120 members of staff, however only 11 dedicated staff parking bays are proposed. National Highways will need to be sure that the level of proposed parking is sufficient to cater for both road users and staff, and therefore further detail is required to understand the maximum staffing number at any one day, and the anticipated requirement for staff parking. In light of this, we request the Applicant provide additional information to support staff parking provision.

Finally, it should be noted that MSAs must include parking provision for a least one abnormal load. This provision is not clearly identified on the Site layout drawing and not referred to the Transport Assessment.

In light of the above comments, further detail is needed to demonstrate that the proposed development meets the minimum requirement for a Motorway Service Area.

Site Layout

Given the Site is accessed directly from the SRN, National Highways will need to consider the layout of the Site to ensure that any conflict points or congestion within the Site will not result in queuing back onto the SRN. National Highways will undertake this review following receipt of an updated Site Layout Drawing (to address our previous comments).

Access

According to the Transport Assessment and Site Layout drawing, access to the Site for vehicles and pedestrians is proposed to be taken from the A5 Watling Street approximately 170m south of Wolvey Road (south) junction and 200m north of the Stretton Baskerville Interchange (M69 Junction 1). The A5 Watling Street at this location is subject to the national speed limit (60mph).

The proposed Site Access is in the same location to that approved under the previous planning consent for a petrol filling station. However, given that the development proposal has since changed, National Highways will need to determine that the proposed access is safe and suitable for the development being proposed.

The proposed access consists of a newly constructed signalised T-junction with the A5 Watling Street, and includes a dedicated right-turn flare into the Site, and duelling of the A5 carriageway towards the M69 J1 (Stretton Baskerville Interchange). A left-turn flare is intended to facilitate access into the Site from the south, with the two-lane approach merging back into one-lane (heading northbound).

The site egress consists of a two-lane approach, to enable access to the A5 Watling Street north and south.

Whilst details of the Site access are described in the Transport Assessment (as above), a drawing detailing the full extents of the access proposals has not been provided. The submission of this drawing is a key item for consideration of this planning application, and we would request that it is uploaded to the planning portal and appended to the Transport Assessment. It should be noted that National Highways expects highway drawings to be designed to a preliminary standard in accordance with the Design Manual for Roads and Bridges (DMRB).

Notwithstanding the above, we have viewed drawing SK004 revision C '*Potential Access Arrangements O4 Swept Path Analysis 16.5m Articulated Vehicle*' and have initial concerns with the proposed layout which does not appear to be DMRB compliant. In addition, given that the Site must also be able to accommodate abnormal loads to meet the minimum requirement for an MSA, swept path analysis must demonstrate that the Site access and internal layout can safely accommodate the movement of abnormal loads without detriment to the safety of oncoming vehicles.

Traffic Impacts

Trip Generation

As per DfT Circular 01/2022, roadside facilities should be well-designed to serve passing traffic. 'Off-line' MSAs can divert traffic onto the nearest junction and surrounding roads increasing the volume of traffic at those locations, whilst there is also a risk to them becoming destinations in their own right. This can adversely affect the safety and operation of the surrounding highway network and consequently the Transport Assessment must show that there would only be a minimal overall increase in trip mileage and that road safety is not compromised.

Given that the current proposal includes signage from the M69 motorway (not part of the existing planning consent), the demand for this roadside facility will increase compared to the previously proposed trunk road services (signed from the A5 only), although it is noted that the previous planning consent included an element of B1/B2/B8 employment use which is now not being proposed.

The Transport Assessment sets out the anticipated vehicular trip generation for the proposal which has utilised TRICS to derive trip rates for the development, selecting land use 'Hotel, Food and Drink', and sub land use – 'Motorway Service Areas'. This category has been utilised for the MSA (1,720sqm), HGV sales area (73sqm) and Drive-Thru (170sqm).

Based on the TRICS calculations, vehicle trip generation is reported as 204 and 170 two-way vehicle movements during the AM and PM weekday peak-hours respectively (08:00 – 09:00 hrs; and 17:00 – 18:00 hours). The maximum number of hourly trips generation by the proposal is estimated to be 539 new vehicle trips (Saturday 13:00 – 14:00 hrs).

We have considered the method used to calculate trip generation which seems appropriate. However, as mentioned previously, the level of car parking has been derived in accordance with Circular 01/2022. We therefore request that the parking provision is checked against a daily trip profile from the TRICS data used to ensure that both the predicted trip generation and levels of car parking are consistent.

We will consider the appropriateness of trip distribution once we are satisfied with the above.

Junction Capacity Assessments

It is noted the Transport Assessment includes a capacity assessment of the M69 Junction 1 Circulatory and Site Access undertaken in LinSig. National Highways will wish to verify the suitability of the model and so will be requesting a copy of the LinSig for review before we review the outputs. However, we will only undertake a review of the LinSig once we have accepted the trip generation and distribution.

Notwithstanding the above, we note that traffic surveys were undertaken on Thursday 18th May and Saturday 20th May to establish current traffic levels at the junction. Whilst this is considered to be a neutral month, we would recommend a weeks' worth of ATCs to make sure that the day chosen is representative of the traffic over a week.

M69 Merge/Diverge Assessment

During pre-application discussions with the Applicant, we advised that the layout of the M69 junction 1 exit (diverge) and entrance (merge) points would need to be reviewed to ensure they remain sufficient following any increase in vehicles using them. This is called a merge/diverge assessment and DMRB Chapter CD122 *Geometric Design of Grade Separated Junctions* sets out the method for calculating the most appropriate layouts.

We noted that Merge/diverge diagrams have been provided by the Applicant in Appendix 7 of the Transport Assessment. However, it is necessary to understand whether the increase in traffic using the merge/diverge (as a result of the proposed development) would require a step change in layout compared to the current design. This is unclear from the information submitted and should therefore be provided.

Off Site Highways Mitigation

Until the above outstanding points have been addressed, it is unclear whether there will be a need for any additional off-site highways mitigation above and beyond those discussed in the Transport Assessment nor whether the proposed changes to the SRN are acceptable.

The Applicant should note that for National Highways to consider the acceptability of physical changes to the SRN, prior to planning consent, proposed changes must be:

- Designed to a preliminary design standard in accordance with the Design Manual for Roads and Bridges (DMRB);
- Have completed a Walking, Cycling, Horse-Riding Assessment and Review (WCHAR) in accordance with GG142 of DMRB;
- Have undergone National Highways design checks;
- Have obtained Agreement in Principle (AiPs) for any Departures from Standard;
- Have completed a Stage 1 Road Safety Audit (RSA) in accordance with GG119 of DMRB;
- Have any identified safety risks managed through the completion of a Safety Risk Assessment in accordance with GG104 (applicable in certain circumstances only).

National Highways has not been consulted on preliminary drawings for any of the proposed physical changes to our network. As such, the Applicant will need to submit these drawings to be uploaded to the planning portal for transparency. Such drawings relate to the Site access design, proposed changes to the A5 carriageway and the proposed changes to the Wolvey Road junction as mentioned in the Transport Assessment.

Any additional changes to the SRN identified following capacity assessments will need to follow the same process.

Boundary Impacts

The Site shares a common boundary with the A5 and M69 motorway. As this is understood to be a Full planning application, potential boundary matters must be addressed at this stage. National Highways has therefore considered the proposed development in relation to any potential boundary impacts on our network and assets and we can set out these comments as follows:

Drainage

Drainage of this Site is of particular interest to National Highways to ensure that surface water run-off from the site does not threaten the integrity of National Highways drainage assets. As set out in Paragraph 59 of DfT Circular 01/2022, National Highways will not accept any water run-off arising from any change of use into our highway drainage systems, or any new connections into those systems from third party development drainage systems. Upon a high-level review of the drainage strategy, National Highways does not have any objections to the drainage proposals although we are awaiting additional comments from our drainage team which we will supply in due course.

Geotechnical

Any excavation and/or landscaping works has the potential to undermine the integrity and stability of the adjacent highway network. As such, if excavation works are within 10 metres of our boundary, prior to the commencement of any excavation (including in relation to landscaping), it would be necessary to set out how geotechnical risks will be identified and managed. This would be undertaken in accordance with Chapter CD122 of the Design Manual for Roads and Bridges (DMRB) and would need to be submitted for our review and approval.

Similarly, it is noted with reference to the Site Layout drawing that a retaining wall is proposed within the southeast corner of the Site. This appears to be within 10 metres of the boundary with our land and as such, further details pertaining to the retaining wall should be submitted for National Highways consideration.

In addition, further information may be required with reference to *BS5837: 2012 Trees in relation to design, demolition and construction*. This is to ensure that our tree stock and associated root systems are protected.

We will provide additional comments from our geotechnical team in due course.

Boundary Treatments and Landscaping

National Highways should be consulted on a boundary treatment and landscaping plan which should clearly set out any proposed boundary treatments and landscaping work near to our network. The distance of proposals (in metres) from our network should be clearly identified. All boundary treatments and landscaping should be positioned entirely within the red line boundary of the site and far enough within the site that it can be installed and maintained without encroachment onto National Highways land. This applies to fences and all vegetation for the duration of their life. If landscaping or boundary treatments are in excess of 10 metres from our boundary (this is our land boundary, not the carriageway), it is usually the case that no further information is required, although the applicant may need to demonstrate that the distance is sufficient. Where landscaping etc is within 10 metres of our boundary, further details will need to be provided for National Highways approval. For instance, some plants are particularly invasive and can pose a threat to our own vegetation and assets.

We note that a landscaping plan (Drawing 1, revision C) has been submitted which details the spacing and variety of plants to be used. We will provide additional comments on this plan once it has been reviewed by our environmental team.

Lighting

Any external lighting schemes have the potential to cast a glare on the adjacent highway causing a road safety hazard. As such, National Highways should be consulted on the details any external lighting schemes. We are content however that this could be managed through suitably worded planning conditions.

Construction Impact

Given the proximity of the Site to our network, National Highways should be consulted on a Construction Traffic Management Plan (CTMP) which could be produced as part of a wider Construction Environmental Management Plan (CEMP). This should clearly set out the numbers and routing of construction traffic, with details of measures taken to ensure that construction traffic has the least impact on the surrounding highway network. We are content however that this could be managed through suitably worded planning conditions.

Off-Site Signage

As per DfT Circular 01/2022 Annex A, roadside facilities that are to be signed from a motorway or motorway junction must meet the minimum requirements for a roadside facility (as mentioned above). Assuming the minimum requirements can be met, it will be a condition of any planning consent that a signage strategy for all new, modified or re-located signs on the trunk road and motorway network is undertaken and approved. Road signs must be designed in accordance with Traffic Signs Regulations and General Directions (TSRGD) and approved by National Highways signage specialists. Other approvals would also be required in relation to signage installation. This is likely to include but not be limited to a Road Safety Audit carried out in accordance with the Design Manual for Roads and Bridges (DMRB). National Highways is usually content for the requirement for a signage strategy to be completed following planning consent. As such, assuming other matters can be resolved, National Highways will be recommending this as a planning condition.

Travel Plan

We have undertaken a high-level review of the Travel Plan and can make the following comments:

The Plan gives no indication of the total number of staff that will be employed on site. The Plan gives no indication of the number/proportions of staff who will be arriving by private car. This should be clear from the outset to ensure that parking used by staff does not deduct from the total number of parking spaces need to serve road users. The Plan offers no clear measures or incentives for reducing travel by private car. The Plan indicates that 29 HGV, 6 Coach, 8 caravan and 10 motorcycles spaces will be provided 'in addition to' the 269 parking spaces. These numbers appear contrary to the Transport Assessment where 269 is the total number of parking spaces. The Plan does not contain any clear measurable targets. The Plan indicates that secure cycle spaces will be provided within the Site, however this is not shown on the Site Layout Drawing.

Summary and Recommendation

In summary, insufficient information has been submitted with this planning application to demonstrate that the proposal is acceptable to National Highways as the highway authority for the M69 motorway and A5 trunk road.

In light of the above, we recommend that this application not be determined for a period of six months from the date of this letter. This is to give the applicant sufficient time to provide the outstanding information as requested.

Standing advice to the local planning authority

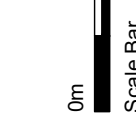
The Climate Change Committee's [2022 Report to Parliament](#) notes that for the UK to achieve net zero carbon status by 2050, action is needed to support a modal shift away from car travel. The NPPF supports this position, with paragraphs 73 and 105 prescribing that significant development should offer a genuine choice of transport modes, while paragraphs 104 and 110 advise that appropriate opportunities to promote walking, cycling and public transport should be taken up.

Moreover, the build clever and build efficiently criteria as set out in clause 6.1.4 of [PAS2080](#) promote the use of low carbon materials and products, innovative design solutions and construction methods to minimise resource consumption.

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.

Appendix 3

Proposed Site Layout Plan

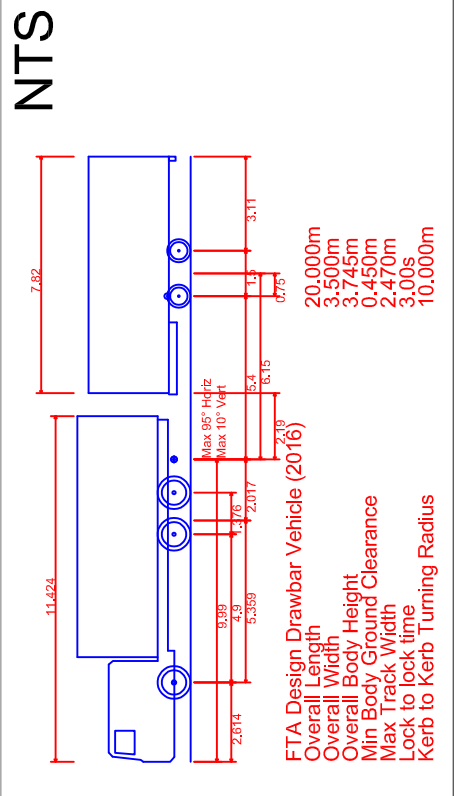
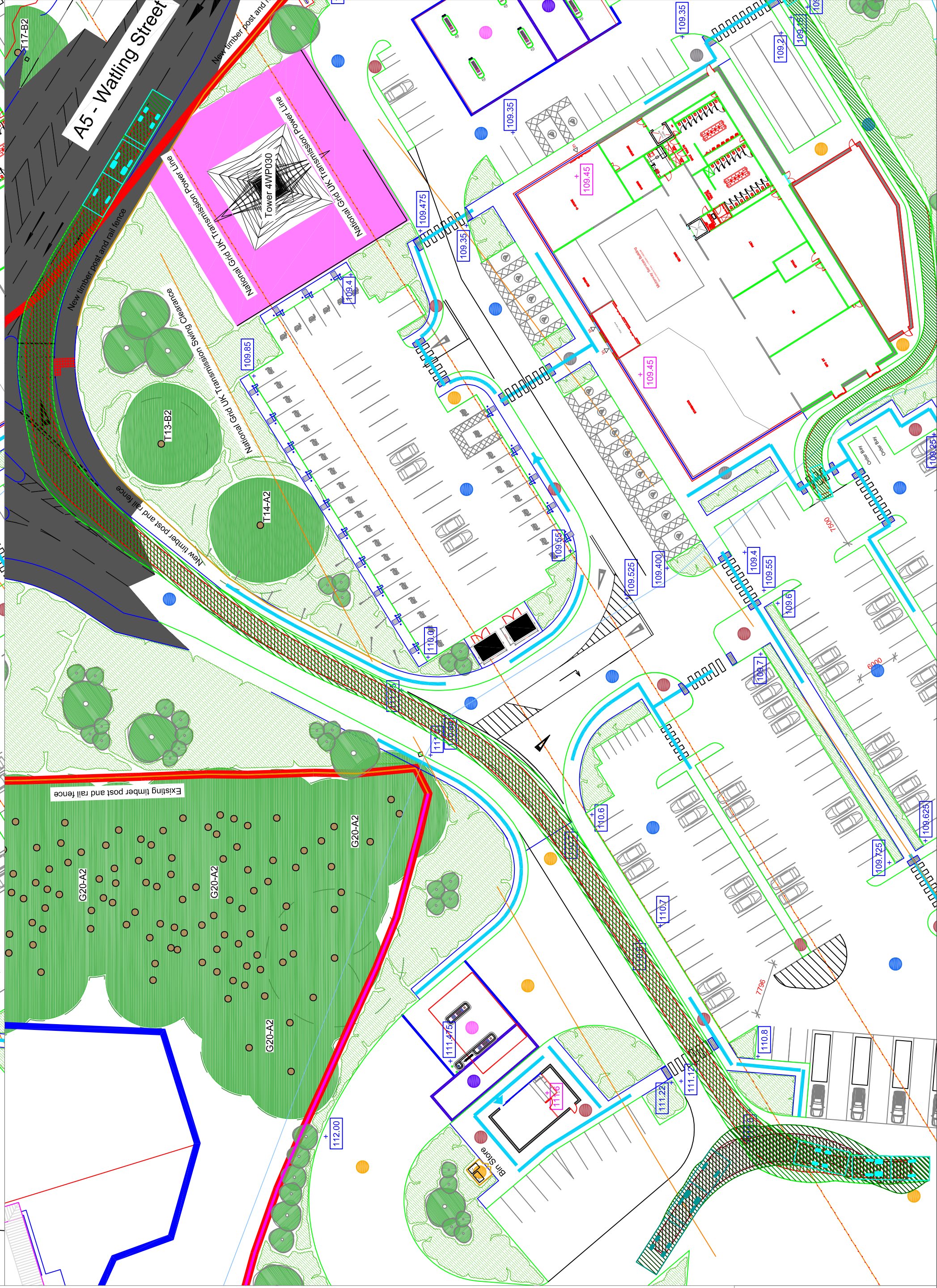
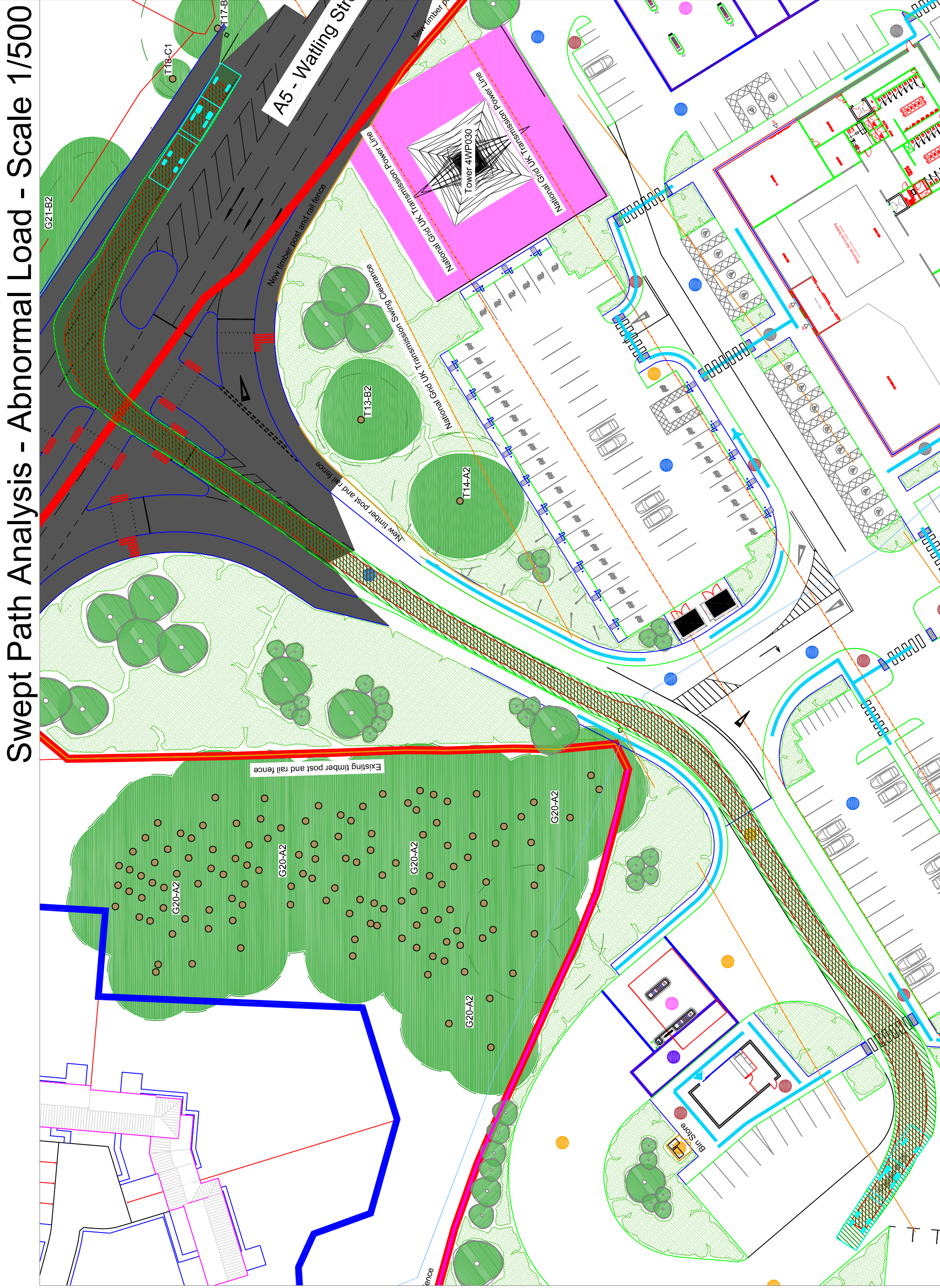


Appendix 4

Swept Path Analysis

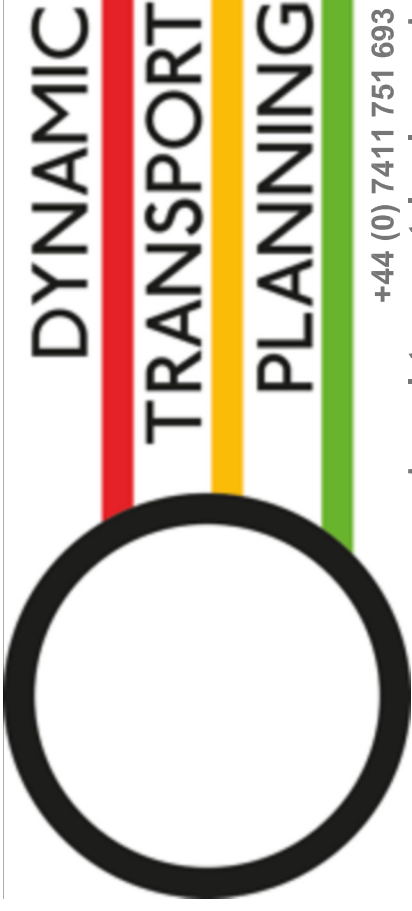


Proposed Site Layout - Scale 1/2000



Notes

Rev.	Date	Revisions	Drawn
-	22.02.23	First Issue	BF



Client

Welcome Break

Project

Proposed Motorway Service Area,
M69 Junction 1, Hinckley

Drawing Title

Proposed Site Layout
Swept Path Analysis
Abnormal Load

Date

February 2024

Scale

As Specified @ A1

Drawn

BF

Approved

JB

Drawing Number

DTP/3711622/ATR002

Rev.

-

Appendix 5

Approved Site Access Arrangement
