



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

From: Andy Jinks (Regional Director)  
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To: Hinckley Borough Council; and Rugby Borough Council

CC: [transportplanning@dft.gov.uk](mailto:transportplanning@dft.gov.uk)  
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**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.<sup>1</sup>

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](mailto: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](mailto:PlanningM@nationalhighways.co.uk).

**Signature:**

**Date:** 19 February 2024

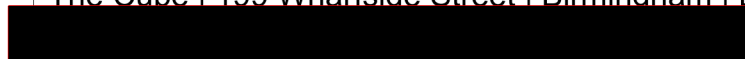


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**Position:** Spatial Planner

**National Highways**

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<sup>1</sup> 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 18<sup>th</sup> May and Saturday 20<sup>th</sup> 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.