

Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name:	Jenna Buss
Date:	15/01/2025
Application number:	PL/2023/09142
Proposal:	Outline application (with Access to be determined) for development of a new Motorway Rest Area (MRA) to provide up to 241 car parking spaces; up to 63 Heavy Goods Vehicle (HGV) parking spaces; coach and caravan parking; amenity building; fuel filling station; new roundabout access from B4005; and associated landscaping, infrastructure and ancillary works.
Site address:	Land at Junction 16 (M4), Swindon
Case officer:	Olivia Tresise

Recommendations:

	No Comment
	Support
	No objection
	Condition (no objection subject to conditions)
x	Objection - further information required
	Objection in principle
	HRA completed/required

Further Information Required:

	Issue	Policy/Legislative Compliance	Date information requested & Further information required	Satisfactorily addressed (Document & Date)
1	Protected Species	Habitat Regulations, CP50, NPPF	GCN District level Licence	

The outstanding document(s) listed above are needed to enable the council's ecology team to consider all the relevant impacts and benefits of the proposed scheme. The council's ecologists will provide a further response once all the above information has been submitted via the case officer.

Please Note: When resubmitting a revised document, ALL changes must be highlighted to enable review.

Matters Considered

I have reviewed the application and supporting documents against OS Maps and aerial photography of the site and surrounding area, together with GIS layers of statutory and non-statutory sites and existing records of protected species.

The following submitted documentation was reviewed to inform this response:

- Environmental Statement 784-B48803. October 223. Tetra Tech
- Illustrative Masterplan M49_115 Rev B. August 2023. Beech
- Biodiversity Impact Assessment. September 2023. Ecology By Design
- Environmental Statement – Non technical Summary (Updated). June 224. Tetra tech
- Ecological Parameters Plan LA5731 001. June 2024. IP Architecture
- Biodiversity Impact Assessment. May 2024. Ecology By Design

- Environmental Statement Volume 2 Appendices Chapter 10 784-B048803. September 223. Tetra Tech
- The Biodiversity Metric 4. March 2024. Ecology By Design
- Swindon Services Lighting Design. October 223. SKR
- Environmental Statement Volume 1 Chapter 1- Ecology. September 2023. Ecology By Design

Protected Species/Habitats

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

1. Great Crested Newts

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

The applicant has submitted their intention to seek a District Level Licence from NE instead of carrying out site specific mitigation and compensation. The applicant is therefore required to apply to Natural England to determine whether the scheme is eligible for DLL. Once the scheme is accepted under the District Level Licensing Scheme for Great Crested Newts, the *Impact Assessment and Conservation Payment Certificate (IACPC)*, which must be signed by the applicant and countersigned by Natural England must be submitted to the LPA prior to determination.

Bats

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

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

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

Reptiles

Surveys undertaken identified small populations of slow worm and grass snake on site. Construction impacts are anticipated, however the enhanced reptile refugia area in the eastern

parcel is welcomed. A mitigation strategy to ensure construction and operational impacts are minimised is required however, this could be secured via condition in the form of a CEMP.

Birds

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

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

Dormice

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

Biodiversity No Net loss

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

The submitted information (The Biodiversity Metric 4.March 2024. Ecology By Design) demonstrates that the development will not result in a net loss of local biodiversity resource and gains are likely from the compensation/enhancement measures detailed in the Biodiversity Impact Assessment. The boundary hedgerows (priority habitat) are part of a scattered tree network that are to be retained as part of the proposal which is welcomed. They currently provide functionally linked habitat to the wider hedgerow and priority deciduous woodland immediately to the south.

These proposals can be secured through a landscape ecological management plan.

Final sign off – all matters addressed:

Ecologist Jenna Buss	Date
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