

Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name:	Jenna Buss
Date:	19/01/2026
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:	Gen Collins

Recommendations:

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

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-B048803. October 2025. Tetra Tech
- The Biodiversity Metric 4. March 2024. Ecology By Design
- Swindon Services Lighting Design. October 223. SKR
- Great Crested Newt IACPC. August 2023.
- DLL-ENQ_WILT-00070-1-Land S of Junction 16, M4 Westbound
- Illustrative Masterplan 915-210 F. May 2024. CG Architects
- Ecology Parameters Plan La5731 001 B. June 2024. IDP
- Proposed Layout Plan (Illustrative) May 2024. CG Architects

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 just outside 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 proximity. GCN presence has been confirmed adjacent to the site. 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.

A signed IACPC has been submitted in support of the application which is welcomed and will be secured by condition.

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. 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 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 be secured by condition.

2. 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.

CONDITIONS:

1. The development will be carried out in strict accordance with the following documents:
 - Swindon Services Lighting Design. October 223. SKR
 - Great Crested Newt IACPC. August 2023.
 - DLL-ENQ_WILT-00070-1-Land S of Junction 16, M4 Westbound
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REASON: For the avoidance of doubt and for the protection, mitigation and enhancement of biodiversity.

2. Prior to the commencement of works, including demolition, ground works/excavation, site clearance, vegetation clearance and boundary treatment works, a Construction Environmental Management Plan (CEMP) shall be submitted to the local planning authority for approval in writing. The Plan shall provide details of the avoidance, mitigation and protective measures to be implemented before and during the construction phase, including but not necessarily limited to, the following:
 - a. Identification of ecological protection areas/buffer zones and tree root protection areas and details of physical means of protection, e.g. exclusion fencing.
 - b. Working method statements for protected/priority species, such as nesting birds and reptiles.
 - c. Mitigation strategies already agreed with the local planning authority prior to determination, such as for great crested newts, dormice or bats; this should comprise the pre-construction/construction related elements of strategies only.
 - d. Work schedules for activities with specific timing requirements in order to avoid/reduce potential harm to ecological receptors; including details of when a licensed ecologist and/or ecological clerk of works (ECoW) shall be present on site.
 - e. Key personnel, responsibilities and contact details (including Site Manager and ecologist/ECoW).

Development shall be carried out in strict accordance with the approved CEMP.

REASON: To ensure adequate protection and mitigation for ecological receptors prior to and during construction, and that works are undertaken in line with current best practice and industry standards and are supervised by a suitably licensed and competent professional ecological consultant where applicable.

3. No development shall commence on site (including any vegetation removal or works to existing structures), until a Construction Method Statement has been submitted to, and approved in writing by the Local Planning Authority. The Construction Method Statement shall include all precautionary measures to be implemented during the construction period, for the protection of sensitive habitats and species known to be present within or adjacent the site, with particular reference to:

Reptiles

The development shall be carried out in strict accordance with the approved Construction Method Statement.

REASON: To ensure adequate protection, mitigation and compensation for protected species and priority habitats throughout the construction period.

4. Prior to the start of construction, a Landscape and Ecology Management Plan (LEMP) shall be submitted to and approved in writing by the Local Planning Authority. The LEMP will include long term objectives and targets, management responsibilities and maintenance schedules for each ecological feature within the development, together with a mechanism for monitoring success of the management prescriptions, incorporating review and necessary adaptive management in order to attain targets.

The LEMP shall be implemented in full and for the lifetime of the development in accordance with the approved details.

REASON: To ensure the long-term management of landscape and ecological features retained and created by the development, for the benefit of visual amenity and biodiversity for the lifetime of the scheme

INFORMATIVES:

Bats

There is a low risk that bats may occur at the development site. Many species of bat depend on buildings for roosting, with each having its own preferred type of roost. Most species roost in crevices such as under ridge tiles, behind roofing felt or in cavity walls and are therefore not often seen in the roof space. Bat roosts are protected all times by the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 even when bats are temporarily absent because, being creatures of habit, they usually return to the same roost site every year. Planning permission for development does not provide a defence against prosecution under this legislation or substitute for the need to obtain a bat licence if an offence is likely. If bats or evidence of bats is found during the works, the applicant is advised to stop work and follow advice from an independent ecologist or the applicant is advised to follow the advice of a professional ecologist or to contact Natural England's Batline through the internet.

Lighting

The habitat within the proposed development site and the surrounding area is suitable for roosting, foraging and commuting bats. An increase in artificial lux levels can deter bats which could result in roost abandonment and/or the severance of key foraging areas. This will likely result in a significant negative impact upon the health of bat populations across the region. Artificial light at night can have a substantial adverse effect on biodiversity. Any new lighting should be for the purposes for safe access and security and be in accordance with the appropriate Environmental Zone standards set out by the Institute of Lighting Engineers in their publication GN01:2021, 'Guidance for the Reduction of Obtrusive Light' (ILP, 2021), and Guidance note GN08/23 "Bats and artificial lighting at night", issued by the Bat Conservation Trust and Institution of Lighting Professionals.

Nesting Birds

All British birds, their nests and eggs are protected under Section 1 of the Wildlife and Countryside Act 1981 (as amended) and the Countryside and Rights of Way Act 2000 while birds are nesting, building nests and sitting on eggs. The applicant is advised to check any structure or vegetation capable of supporting breeding birds and delay removing or altering such features until after young birds have fledged. Damage to extensive areas that could contain nests/breeding birds should be undertaken outside the breeding season. This season is usually taken to be the period between 1st March and 31st August but some species are known to breed outside these limits.

Final sign off – all matters addressed:

Ecologist Jenna Buss	Date 19/01/2026
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