

**Communities**

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Application reference number: R18/0186

Application type: Major Application

Location: COVENTRY STADIUM, RUGBY ROAD, COVENTRY, CV8 3GJ

Proposal description: Demolition of existing buildings and outline planning application (with matters of access, layout, scale, and appearance included) for residential development of up to 137 dwellings (Use Class C3) including means of access into the site from the Rugby Road, provision of open space and associated infrastructure and provision of sports pitch, erection of pavilion and formation of associated car park (details to be confirmed) (amended Plans).

Thank you for your consultation on the above application. My comments are based on the following documents:

- Ecological Impact Assessment, Ecolocation (Revision A 05/07/2021)
- Bat Roost Assessment and Roost Characterisation Surveys, Ecolocation (02/07/2021) and
- Reptile Assessment: Presence/Absence surveys, Ecolocation (Revision B 05/07/2021) and my comments are as follows:

**Bats**

The Bat Roost Assessment includes an updated inspection of the buildings and activity surveys which confirmed the presence of roosting bats in buildings B4, B5 and B8. Mitigation has been set out in the report which includes timing restrictions, supervision of destructive works to the roost features and long-term provision of bat roost boxes within the new scheme. The precautionary working measures for bats should be included, along with mitigation and precautionary working measures for other species, in a **Construction Environmental Management Plan (CEMP)**. A **Combined Ecological and Landscape Scheme** should be produced to show the location of bat boxes, alongside other biodiversity enhancements as described below.

No mention was made in the Ecological Impact Assessment (EclA) or the Bat Roost Assessment about the suitability of the trees within the site for roosting bats. Presumably an assessment would have been made as part of the EclA/Roost Assessment. Confirmation of this and recommendations for mitigation/precautionary working measures for removal of trees will be required prior to determination.

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The EclA recommends that a sensitive lighting strategy is implemented to avoid impacting on bat foraging behaviour, and that lighting should in particular be directed away from ecologically valuable features such as the retained boundary woodland. The proposed layout retains the trees at the northern edge of the site bordering onto New Close and Birchley Wood LWS and includes additional planting along this boundary. However, I am concerned about the proposed siting of the sports pitch which appears to be 10-15 metres from the existing tree line and will result on light spill directly onto the trees which will have a detrimental impact on the ancient woodland. As it stands there is no room for additional tree planting to screen this effects and consideration should firstly be given to **moving the pitch away from the woodland edge** to reduce this effect.

A condition for a **bat sensitive lighting scheme** should also be attached to any permission granted.

### **Amphibians**

The EclA includes an investigation of the three ponds on and adjacent to the site for their potential to support great crested newts. The Habitat Suitability Index assessment found all three ponds to be 'below average' suitability for GCN, but no further investigation has been made. Pond 4 in particular is adjacent to the site and if it were used by GCN for breeding the ephemeral, tall ruderal and scrub habitats around the stands could represent core terrestrial habitat. Pond 1 was dry at the time of survey but I would expect ponds 2 and 4 at least to be subject to **presence/absence surveys** using either eDNA or a combination of methods in order to confidently conclude that GCN are absent from the site.

### **Reptiles**

The presence/absence survey report consisted of six visits in suitable conditions in September 2020. No reptiles were found during these visits. These surveys were an update of the previous reptile surveys carried out in 2014 and which concluded that a breeding population of grass snakes was present. The report makes recommendations for reasonable avoidance measures to avoid causing harm to reptiles within the site. These measures should be included within the **CEMP**.

### **Biodiversity**

The EclA makes recommendations for including habitat creation within the landscape scheme to compensate for loss of habitats on site and ensure a net biodiversity gain. In order for this to be measurable a **Biodiversity Impact Assessment** must also be produced based on the existing habitats and proposed on-site habitat enhancements, using either the current version of the DEFRA biodiversity metric or the version currently adopted in Warwickshire, Coventry and Solihull.

The on-site habitat creation and enhancement proposed in the BIA should be secured through a condition for a **Landscape and Ecological Management Plan (LEMP)**.

### **Other species**

The EclA makes recommendations for mitigation measures for habitats, the adjacent Local Wildlife Site, nesting birds, badgers, reptiles and amphibians and other species. These measures should be set out in the CEMP, designed to be read and followed by workers on site.

Habitat creation and enhancement features for bats, nesting birds and other species as recommended in the report should be detailed in a **Combined Ecological and Landscaping Scheme**.

## **RECOMMENDATIONS**

### **Pre-determination:**

Updated EclA to include Preliminary Bat Roost Assessment of all trees on site, Biodiversity Impact Assessment and pond surveys for great crested newts.

Consideration to relocating the sports pitch OR lighting scheme to show how lighting will be designed to avoid impacting the Ancient Woodland Local Wildlife Site.

Following receipt and approval of the above information the following documents may be secured by conditions, for which I will provide wording:

- **Construction Environmental Management Plan**
- **Combined Ecological and Landscape Scheme**
- **Lighting Scheme**
- **Landscape and Ecological Management Plan**

I will provide further advice upon receipt of the above.

Yours sincerely,

Ben Wood  
Ecologist