Date: 09/07/2019
Comments from: Ecology
Site and Planning App No: OUT/2019/0022, Land at Fivefield Road and Tamworth Road

No Comments	
No Objection	
No Objection Subject to Conditions	
Objection	
Further information Requested	Y

Comments

I have read the relevant ecological sections of the Environmental Statement submitted as part of the outline planning application (Chapter 6 and Appendix 6).

I have also read the ecological concerns relating to this outline application of Vanessa Evans, Coventry City Council Ecology Officer at the time (from her response dated 3rd May 2019) as well as the objection missives provided by The Woodland Trust (dated 4th February 2019) and the Warwickshire Wildlife Trust (dated 1st February 2019). I have also read the subsequent letter reports from EDP, addressing these concerns (reference edp3854_r018 and edp3854_r019b), along with the 'Technical Briefing Note 1: Response to Ancient Woodland and Associated Buffer Requirements', prepared by Sylvan consulting (dated 11th April 2019).

I am generally satisfied with the scope and majority of the findings of the habitat and protected species survey work carried out for the site, as detailed within chapter 6 and Appendix 6 of the Environmental Statement submitted as part of the outline application. I particularly welcome the green infrastructure and biodiversity enhancement proposals across the site, including a 20m buffer of Hall Brook to be managed sensitively for wildlife. However, I raise the following questions, for which additional information will be required as response:

The main concern pertaining to this outline application is the establishment of a sufficiently wide buffer between the proposed development and the adjacent Ancient Woodlands (Pikehorne Wood and The Alders). The Natural England Standing Advice is a material consideration in planning ecology terms and should carry significant weight in decision-making.

I note that a minimum of 15m buffer will be retained along the boundaries of existing Ancient Woodland, in line with Natural England Standing Advice minimum requirements. However, Natural England Standing Advice goes on to state that, *"where assessment shows that other impacts are likely to extend beyond this distance, you are likely to need a larger buffer zone"* and good practice guidance for planners from the Woodland Trust (October, 2017) recommends widening of buffer zones to 50m. Queries have been raised by Coventry City Council Ecology Officer, Warwickshire Wildlife Trust and the Woodland Trust as to whether 15 metres constitutes a sufficient buffer to avoid adverse impacts on the adjacent Ancient Woodland, particularly during the operational stage of the development. The EDP response letters (ref edp3854_r018 and edp3854_r019b) along with the Sylvan Technical Briefing Note document, together provide a detailed response to

these queries, justifying the adequacy of the 15m buffer, which I welcome.

However, a few concerns remain for me, relating to the potential impact of the development on the adjacent Ancient Woodlands. Firstly, the absolute minimum buffer between development and ancient woodland would be 15 metres, in accordance with Natural England standing advice, and any additional buffer would be very much welcomed (see additional comments on this below). However, I note with concern the wording in Section 2.7 of the Sylvan Technical Briefing Note, which states that the 15m buffer will be retained along the ancient woodland boundaries, to incorporate a suitable Root Protection Area (RPA) of boundary trees, except '*where smaller trees are so located, such that their RPA requirements can be met with a smaller offset*.' **Warwickshire County Council Ecological Services would object to the development on ecological grounds if the minimum 15m buffer is reduced at any point along the ancient woodland boundaries.** Furthermore, as per section 2.8 of the Sylvan Technical Briefing Note, I would wish to see the results of an appropriate assessment of the RPA of the trees on or close to the ancient woodland boundary, including a survey for any veteran or ancient tree specimens using standard survey guidelines, to ensure that the buffer zone is extended beyond 15m where necessary to protect the root system of all woodland trees, taking into account the additional requirements of veteran tree protection. As such a survey can be carried out from within the site, negating the need for woodland landowner permission, I do not feel that this is an unreasonable request.

As such, I request that a detailed plan that clearly shows the proposed woodland buffer width is provided, which, following approval, can form the basis of ecological conditions attached to any outline application approval granted for the proposed scheme.

Secondly, I observe that there is still an absence of an up-to-date base-line ecological survey of Pikethorne Wood and The Alders on which to base the findings of these responses, which reduces confidence in the findings of the Technical Briefing Note and associated letter reports from EDP, which I feel must be taken into consideration. However, I accept that to insist on such a base-line survey is unreasonable, given the lack of access permission granted by the ancient woodland land-owners. Nevertheless, data from any future ecological survey of the woodland should indeed, where possible, be incorporated into an iterative process of regularly updating any subsequent management plans for the woodland buffer zones, as stated in section 3.2 of EDP's letter response (ref edp3854_r019b).

My third query relates to the proposed time-scale of the future development, and whether this will be able to accommodate sufficient lead-in time to sufficiently establish the buffer zone vegetation prior to development commencing. **At this stage I would require reassurance, through provision of a proposed phasing of works schedule**, in order to demonstrate that this will be possible, for example by timing the planting of the buffer zones at the outset of the construction period and phasing house construction to commence in areas furthest away from the buffer zones first, such that only the final phase of house construction will be located adjacent to the woodland buffer zones, giving them more time to establish. Full details of the nature of planting, ecotone creation and long-term manaement of the buffer zones will also be required prior to determination of reserved matters, and the buffer zones should be designed, created and managed strictly in line with Natural England Standing Advice guidelines on creation of ancient woodland buffer zones, in order to ensure that these buffer zones are maximised in terms of benefits for wildlife, with sensitivity to their location adjacent to ancient woodland habitat.

Finally, I must state that, in such cases as this, the cumulative impact of a large development such as this on a sensitive, rare and irreplaceable habitat such as an ancient

woodland is very difficult to ascertain with confidence, both due to the complexity of layered ecological networks and, perhaps more notably, due to the variables and unknowns of the behavioural patterns of future residents in the proposed housing development. I do appreciate the effort that the applicant has gone to, to provide an evidence-base for justifying the 15m boundary, but the nature of ecology and prediction of social behaviour is such that a justification will always carry an inherent element of educated guesswork and subsequent risk, which is why the creation of as wide a buffer as possible is so important. The reason for a buffer is, of course, just that; to buffer any negative impacts, known or unknown, as best as possible. Therefore the objective, from an ecological point of view, is always going to be to create as wide a buffer as possible. I therefore state that, although I cannot argue with the comprehensive response from EDP and Sylvan as to the adequacy of the 15m buffer width, it is my sincere desire to include as wide a buffer as possible in this proposed development, and if there are any areas where the buffer could be extended beyond 15m along the ancient woodland boundary, especially around particularly sensitive ecological features such as veteran trees or hydrological features, or where green corridors can be created between the ancient woodland and green infrastructure features within the site, this would be welcomed, to preserve the long-term viability of such an important ecological asset. We would also be looking for sensitive design of the area of proposed development that abuts the buffer zone. As such, within an additional buffer of 10m from the outer edge of the 15m woodland buffer zone, we would be sympathetic to ground-level built form, such as access, cycle-ways and informal or formal public open space areas, but would not wish to see raised built form or gardens in this area. **This additional 10m buffer of sensitive design should be demonstrated on the woodland buffer plan, to be submitted prior to determination of this outlined application.**

Other more specific queries that remain, following reading the Biodiversity chapter of the Environmental Statement are:

- In section 6.4.2 of the report, it states that the Five Field Road Ecosite was found to no longer support dwarf gorse or broom. However, no mention of whether the ecosite still supports harebell (*Campanula rotundiflora*) was made, which is classed as a 'Near Threatened' species in England (*Stroh et al., 2014*). Clarification of whether this species was found on-site is required. If present, we would seek to retain and enhance this species, ideally in-situ, as part of any proposed ecological management plan for the site.
- eDNA analysis of the ponds confirmed presence of great crested newt in Pond 5 (off-site). In order to establish population size and inform any subsequent licence application, further great crested newt survey work will be required on this pond at the appropriate time of year, following standard best-practice, especially as the previous survey-work done on this pond is four years out of date as I write this.
- I have concern that, despite a juvenile reptile being found on-site, proving a breeding population in the near vicinity, reptiles have been reserved as of site importance only. I feel, given their protected status and the known presence of a breeding population in the close vicinity, any proposed mitigation for this species should be appropriate to this level of concern and I would welcome reassurance that this will be the case despite the assessment of reptiles being an ecological receptor of site level only.
- In Table 6.6, in relation to foraging bats, sensitive lighting strategy during construction and beyond is not mentioned in the Inherent and Standard Mitigation Measures column; only sensitive timing of works is mentioned in this column. I feel the sensitive, minimal lighting of any commuting, foraging or potential roosting areas for bats is an important part of mitigation for bats and should be included in this table.

I welcome and support the additional precautionary working methods, mitigation and compensation measures for habitats and protected species, as outlined within Section 6, Biodiversity, of the Environmental Statement, and particularly welcome the biodiversity enhancement and green infrastructure proposals outlined for the site, as developments of this scale represent a real opportunity for biodiversity gain within the urban-rural environment. These measures will need to be secured by condition at reserved matters stage and will depend in part on the additional survey work and information requested above.

Further information (if any)

Additional information required at this outline stage is specified below. Full details of all ecological aspects will be required at reserved matters stage, for example comprehensive details of the nature of planting, ecotone creation and long-term management of the woodland buffer zones, and all ecological mitigation, compensation and enhancement measures across the site, for habitats and species.

- A detailed plan showing the extent of the proposed woodland buffer zone (which should be an absolute minimum of 15m at any point), to incorporate extended areas dependent on the results of a veteran tree survey and tree RPA assessment along the woodland edge and to capitalise on any other opportunities for biodiversity gain within the wider layout scheme, for example where the buffer can be extended to join up with other green infrastructure features throughout the site, and to also demonstrate the indicative sensitive treatment of the 10m width area of the site that abuts the outer edge of the woodland buffer.
- Information from the applicant regarding an update to the Sylvan Technical Briefing Note, section 2.7, to ensure an absolute requirement for minimum 15 metre buffer along ancient woodland sites, regardless of diameter of boundary trees and their subsequent RPA, plus any further information relating to possibilities within the design scheme to extend the buffer beyond 15m where possible.
- Survey of Root Protection Area (RPA) of woodland trees along or close to the ancient woodland boundary, to incorporate a record of all veteran trees along or close to the woodland boundary that require particularly sensitive root protection.
- Proposed timing of works/phasing for the scheme, to show the feasibility of establishment of an adequately vegetated buffer prior to construction phase and operational phase.
- Information on presence or absence of *Campanula rotundiflora* or any other notable species within the site boundary, using up-to-date list of notable/rare plants (i.e. A Vascular Plant Red List for England (Stroh et al., 2014)).
- Additional presence/absence/population size assessment of Pond 5, relating to great crested newts, in order to inform licence application and appropriate mitigation.
- A response as to whether reptiles can be included within an up-dated Biodiversity Chapter of the Environmental Statement as of Local importance, and subsequent inclusion in subsequent sections. Or, alternatively, reassurance that mitigation for reptiles will be sufficiently robust, considering the known breeding status of grass snakes in the near vicinity, likely to be associated with the Hall Brook corridor.
- Inclusion of sensitive lighting/dark corridors in Table 6.6 of Biodiversity Chapter of the Environmental Statement, as Standard Mitigation required for foraging/commuting and roosting bats.

Amendments Recommended (if any)

Conditions Recommended (if any)

Dependent on the outcome of the additional survey work required, as outlined above, should the application be approved, conditions will be required to cover the following ecological aspects, many of which will be covered as part of a Construction Environmental Management Plan (CEMP) and an Ecological Management Plan (EMP) for the site, and/or secured through a Section 106 Agreement, particularly in terms of biodiversity off-setting:

- full details of long-term protection of adjacent Ancient Woodland through use of an ecological buffer zone of at least 15 metres, including its establishment and long-term management, plus other measures utilised to ensure minimal disturbance of and negative impacts on the ancient woodland habitat are maintained long-term;
- sensitive design of the 10m width of site that abuts the outer edge of the woodland buffer, to include no raised built form in this area;
- protection of protected species including bats, nesting birds, reptiles, great crested newts, badgers and other notable mammals, through precautionary working methods and mitigation, and long-term enhancement of habitat for these species/species groups;
- protection and long-term management of existing and retained habitats of local importance and above, including existing semi-improved neutral grassland, hedgerows, woodland, trees, watercourse and ponds;
- pollution prevention measures to prevent contamination of ecological features;
- sensitive drainage scheme to avoid negative impacts on the existing hydrology of the site and the adjacent ancient woodland;
- use of a wildlife-sensitive lighting scheme throughout construction and operational phase; and
- biodiversity off-setting, biodiversity enhancements and green infrastructure provision throughout the site, as part of a comprehensive landscaping strategy that has biodiversity gain as one of its central tenets.

Manager sign off

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