

On completion please always send to Rob Haigh  
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**Date: 09/08/2019**

**Comments from: Ecology**

**Site and Planning App No: OUT/2019/0022**

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

#### Comments

The following comments in italics are in reference to the edp letter comments edp3854-r020a and need to be taken in consideration to the original Ecological comments previously submitted.

#### **2. Further Information Requested in Relation to the Biodiversity Chapter**

2.1 It is confirmed that there is no recorded presence of harebell (*Campanula rotundiflora*) recorded within the Site. No other plants that are listed as notable or rare were recorded within the Site.

- *Thanks for the update*

2.2 Since the eDNA survey was carried out on Pond 5 at the edge of the Site, the pond has become more over grown with scrub and become shallower due to silting. It is therefore concluded that although the previous survey data is over four years old it is very unlikely that that the population of great crested newts will have increased.

2.3 It is acknowledged that in order to inform any license application for future development of the Site, a full population estimate will be required from standard best practice surveys. However, as it is likely that it will be a number of years until the Site will be developed, it would be best to undertake these surveys closer to the time of a detailed application coming forward to ensure that they are as up to date for that application. The data presented within the ES chapter is considered sufficient and robust to inform the outline proposals, especially given the decline in the suitability of the pond over the last year.

- *Agreed. I would suggest that there is enough information to understand that the existing GCN population can be retained and possibly enhanced through the scheme. This will be part of the reserve matter scrutiny. Therefore, no additional surveys are needed prior to determination but as noted will be required to inform a licence application and appropriate mitigation.*

2.4 The finding of the single juvenile grass snake during the reptile survey, even if the population were breeding within the Site, would not be regarded as an ecological receptor of any higher than Site level importance. However, given their protected species status I can confirm that appropriate mitigation would be required at the construction stage of any development coming forward. This would be provided within the Ecological Construction

Method Statement (ECMS), which is recommended within the ES and should be conditioned within any permission coming forward.

2.5 The long-term future management of the development proposals as recommended within the ES would also provide suitable habitats for reptile species and would provide suitable breeding habitats on-site. The management prescriptions would be set out within an Ecological Management Plan (EMP), which is also recommended within the ES and should be secured through condition.

- *Agreed. Similar to the newts above it should be assumed that there is a breeding population in the vicinity or on site and as such can be dealt with during reserve matter scrutiny and the CEMP/LEMP conditions. However, it is essential that the surveys are carried out prior to reserve matter submission so that the final layout can be informed by these surveys.*

2.6 With regards to foraging and commuting bats, a sensitive lighting strategy has been proposed within the ES chapter for both the construction phase and the operational phase of the proposed development. For the construction phase, timings of works set out within the Construction Environmental Management Plan (CEMP) will restrict the use of lighting at night and is detailed on page 6-24 and within table 6.6. A sensitive lighting strategy is also recommended for the operational phase as detailed within table 6.7.

2.7 The lighting strategy was further discussed and set out within the previous note that was prepared (ref: edp3854\_r019a) at paragraphs 3.10-3.13. Therefore, we feel that this has been sufficiently discussed and documented.

- *A lighting plan and strategy for each phase will be required as can be conditioned.*

### **3. Conclusions**

3.1 It is considered that the information that has been provided to Coventry City Council both through the ES Chapter, Appendices and subsequent Response Notes is robust and provides sufficient information to allow the council to make a decision for this outline application.

3.2 Recommendations have been made that should form suitably worded conditions attached to any outline permission, such as the production of the ECMS and EMP, which would ensure that the existing ecological interests is not only safeguard but provides enhanced opportunities for a variety of species and deliver net gains in biodiversity.

- *Net gain will be covered through a section 106 where the principal BIA is updated after each phase's layout plan (reserve matter) is agreed. Warwickshire County refers to this as a 'tracking' obligation.*

#### **Further information (if any)**

#### **Amendments Recommended (if any)**

<b>Conditions Recommended (if any)</b>
See above and previous comments
<b>Manager sign off</b>
RH