

**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. I have read the Addendum to Ecological Impact Assessment (21/10/2021) produced by Ecolocation and viewed the updated Illustrative Masterplan (Revision J) received on 11<sup>th</sup> January 2022. Unfortunately I was unable to view the Landscape Concept (Revision H) through the RBC planning portal.

My comments are as follows:

**Bats**

The Bat Roost Assessment includes an updated inspection of the trees on the site and identifies four groups of trees which have the potential to support roosting bats. These trees appear to be retained in the plans, but if it becomes necessary to remove them or cut them back, further survey work will be required to ensure that bats are not harmed. Protection measures for retained trees should be included in the **Construction Environmental Management Plan (CEMP)**.

I am pleased to see from the updated Illustrative Masterplan that the layout has been redesigned to increase the distance between the proposed sports pitch and the edge of the adjacent ancient woodland, which will be further mitigated by lighting design and by trees and shrubs planted in the intervening landscaped areas. I am satisfied with the layout and recommend that a condition for a **bat sensitive lighting scheme** is attached to any permission granted. No lighting should be installed closer than the sports pitch to the north-western site boundary.

*Working for  
Warwickshire*

## **Amphibians**

The addendum includes an updated Habitat Suitability Index of the three ponds on and adjacent to the site for their potential to support great crested newts (GCN), with 'poor' results for pond 2 and 3 and 'below average' for pond 4. These visits were undertaken in October, when ponds 2 and 3 were found to be dry. My recommendation remains that 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. Ponds 2 and 4 are both within the site and will likely be destroyed during works. The potential presence of GCN within these ponds is a material consideration and more information is currently needed before this application may be approved.

## **Biodiversity Net Gain**

No **Biodiversity Impact Assessment (Biodiversity Net Gain Assessment)** has been undertaken to date. My recommendation remains that a BIA is 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. This is a requirement prior to determination to ensure that the development results in a biodiversity gain in accordance with NPPF.

## **RECOMMENDATIONS**

### **Pre-determination:**

**Biodiversity Impact Assessment** to demonstrate how the development will result in a net biodiversity gain in accordance with NPPF.

**Presence /absence surveys for GCN** of Ponds 2 and 4, using eDNA or traditional methods.

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