

**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 regarding the additional information submitted for the above application. I have read the GCN letter report dated 1st July 2022, and the Biodiversity Impact Assessment (27th June 2022).

My comments are as follows:

**Great Crested Newt (GCN) surveys.**

The GCN report includes the results of further investigation of ponds 2 and 4 as discussed in my previous correspondence. I am now confident that great crested newts are unlikely to be impacted by the proposed works if the mitigation set out in the report is included in a CEMP and followed in full.

**Biodiversity Impact Assessment**

The Biodiversity Impact Assessment report presents the summary page from the Defra Biodiversity Metric 3.1, which was filled in based on the landscape and concept drawings.

I have a few comments on the metric itself:

1. There is a small discrepancy of 0.1ha between between habitats lost (8.72) and created (8.82). It seems a little high to be rounding error but does not affect the net result significantly.
2. It is not clear which areas are defined as new woodland and which are mixed scrub. The latter is described as 'understorey element of tree planting'. It is important that the scrub and woodland areas are not double-counted. The discrepancy is only 0.1ha whereas the scrub is 1ha, so it doesn't look like there is an overlap, but a plan showing the approximate areas mapped for the BIA would be helpful in clarifying this.

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3. The football field is mapped as modified grassland but according to the Sports Pitch and Car Park Landscape Concept (Revision H) the pitch will be artificial turf (3G ATP). This should be classed as 'developed land: unvegetated unsealed surface' with a distinctiveness value of 0.
4. It is not clear what the created Tall herb communities represents. Is this marginal vegetation around the attenuation features? Again a map would be useful here to clarify this.
5. Condition of proposed woodland, mixed scrub and tall herb is 'good'. It would be useful to have more information as to how these habitats will be managed in order to meet the specific condition assessment. For example, mixed scrub must meet all criteria for good condition: This includes clearings, glades or rides, a well-developed edge with scattered scrub and tall grassland and diverse age range.

As it stands it is not clear whether the metric fully represents the achievable proposed habitats. In order to be sure that the development will result in a biodiversity net gain I request the following:

**Pre-determination:**

- *Revised biodiversity metric to address the above comments relating to the football pitch, area totals and achievable habitat condition.*
- *A plan showing the areas used to populate the metric, keeping in mind that the landscape scheme is indicative.*
- *Within the BIA report, a breakdown of proposed habitats and an outline of how habitats will be managed to achieve the proposed condition.*

Following receipt and approval of the above information, assuming that the metric still demonstrates a net gain, the following documents may be secured by condition, 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  
Senior Ecologist