**From:** Louise Sherwell [mailto:louisesherwell@warwickshire.gov.uk]
**Sent:** 18 December 2017 16:50
**To:** Planning
**Cc:** Caroline Ford
**Subject:** 17/02394/OUT - OS Parcel 9100 Adjoining And East Of Last House Adjoining And North Of Berry Hill Road Adderbury

Hi Caroline,

Regarding the above application, the Extended Phase 1 habitat survey was undertaken at an appropriate time of year (26th June 2017) and in line with appropriate methodology. The application site comprises largely of grassland fields, the central parcel being used for horse-training purposes and three larger fields (1 m in height at the time of the survey) comprising likely poor semi-improved grassland from the species list recorded (the report refers to both improved and semi-improved grassland). The site boundaries comprise of species-rich hedgerows with scattered mature trees. Overall the site is considered to have low-moderate ecological value, with the northern most area of the site which is proposed to be retained of the highest value compared to the southern area of grassland due to its position adjacent to rough grassland and wetland habitats to the north. There are records of great crested newts and ponds located to the north, however no ponds to the south according to OS mapping. The hedgerow boundaries and a number of mature trees are of high ecological value and provide wildlife corridors within the local area and should be retained.

The northern part of the site is proposed to be retained and managed as public open space as well as for the creation of an area of species rich grassland managed for ecological enhancement. Therefore there is likely to be conflict between these two purposes and whilst the enhancement as wildflower grassland is welcomed, this will involve only one or two grass cuts a year and therefore it will need to be carefully considered if this is realistically achievable in the long term management of the site, or whether this area will be required for other purposes (e.g. dog walking etc) and open space which will need regular cutting of the grassland, with disturbance by dog walkers and where species-rich grassland may not be realistically achievable.  A number of ecological enhancements on site are proposed which are welcomed, which include proposed improvements to habitat connectivity within the wider landscape through retention of existing hedgerows, new native planting along the boundaries and woodland planting.

For all major applications, we would recommend that a biodiversity impact assessment (BIA) calculation is provided by the applicant's ecologist, **prior to determination** of the application. This is to inform if a biodiversity gain is expected within the site, which we should seek in line with the NPPF and local plan policy ESD10. At present, the proposals appear to be borderline loss/ gain, the BIA is a useful tool to provide an estimate of the net gain or net loss to biodiversity at the outline stage of the application, based on the existing and proposed habitat creation. Should the proposed works result in a net loss, a biodiversity offsetting scheme would be recommended to be secured via a Section 106 agreement. I've attached the Warwickshire, Solihull and Coventry BIA calculator and guidance notes and happy to discuss if you or the applicant's ecologist need any further information. I would recommend that on-site habitat creation could include a pond or wetland features if possible (for example SuDs) which would be welcomed to contribute to the biodiversity value of the site.

Regarding the potential impact on great crested newt, I would like to highlight that there is a recently recorded great crested newt record which was not picked up during the ecological assessment (presumably because it was only recently recorded) c. 200m to the north of the site boundary. The nearest ponds are 115m to the north west of the site boundary (referred to as WB2 in the report) and 120m to the north west (WB3) and there is another pond approx. 200m to the north over the disused railway line. Habitat Suitability Index assessments of ponds WB2 and WB3 undertaken by the ecologist found the ponds to be of below average suitably to support GCN. However given the proximity of the ponds and known records, I would agree that there is potential for GCN to be present on site. However given that the northern part of the site is proposed to be retained and enhanced, I am not as concerned regarding the potential of the development to impact on GCN due to the distance between the ponds and the area proposed for housing. Should the area proposed for housing be fenced off from the development site to protect it from site clearance works (ie. east to west), I would agree with the report that GCN surveys of the ponds would not be required.  However, if works (e.g. earthworks, or regrading of the land etc) of the the grassland habitat in the northern part of the site is proposed, I would strongly recommend that GCN surveys of the ponds are required due to the proximity of the ponds and fully assess the potential impact of these works. Should this area be protected, I agree that a Precautionary Working Method for GCN and also for reptiles such as grass snake and slow worm, will be required to be submitted and agreed by the LPA prior to any site clearance works, to appropriately mitigate for the low risk of reptiles and GCN being present within the site.

The two trees with bat roosting potential are present in the hedgerow along the northern boundary of the site. I understand these are proposed to be retained within the development.  If the trees are proposed to be felled, however, further surveys to determine if a bat roost is present will be required to be undertaken by a suitably qualified ecologist in line with the Bat Conservation Trust guidelines. No evidence of badger was recorded during the survey however mammal paths were recorded within the southern boundary hedgerow. The proposals are therefore considered unlikely to have any significant impact on badger however a pre-commencement badger check by an ecologist will be required to update the results of the survey prior to any site clearance works. I also agree with the proposed inclusion of habitat boxes for bats, birds and invertebrates within the built environment, to include swift nest bricks (ideally integrated into the walls of the buildings).  Lighting should be kept to a minimum, in particular along existing hedgerows as these are likely to be used by commuting/foraging bats.

Kind regards,

Louise

Louise Sherwell MSc ACIEEM

Assistant Ecologist

Ecological Services

Community Services

PO Box 43, Shire Hall

Warwick

CV34 4SX

Tel: 01926 418028

email: louisesherwell@warwickshire.gov.uk

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