

30 October 2023

Our Ref: L/edp7182/EDe/NHa

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Dear Louise

**PLANNING APPLICATION W/23/0145 ADDRESS: Woodside Conference Centre,
Glasshouse Lane, Kenilworth**
**PROPOSAL: Demolition of Existing Buildings and Erection of 55 Dwellings and
Associated Works**
Planning Officer: Dan Charles

The Environmental Dimension
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Registered Office: Quarry Barn,
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Following receipt of your comments regarding the demolition of existing buildings and erection of 55 dwellings and associated works at Woodside Conference Centre, Kenilworth, dated 15 August 2023, please find below my responses.

Extended Phase 1 Habitat Survey

"I welcome the species surveys undertaken by EDP in response to Louise Sherwell's concerns, and accept that they have been carried out according to best practice guidelines. Their extended Phase 1 Habitat map shows existing habitats clearly, and although it was apparently carried out on 15th March this year; well outside the botanical survey season (optimum times: May/June), the range of habitats present (including buildings, hardstanding, broad-leaved trees, species-poor grassland and scrub, can generally be assessed accurately enough to see if further survey work is required."

I would like to highlight again here that the Extended Phase 1 Habitat survey was undertaken in May, which is within the optimal survey period for this survey type.



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Mitigation Hierarchy and Design

“Whilst EDP mention the basic ecological principle of avoidance (to habitats & species of ecological concern) as being the preferred first step before looking at potential mitigation and compensation measures, However, this option does not appear to have been considered in their Ecological Appraisal. There is a large existing waterbody at the eastern end of the site, currently surrounded by dense bramble dominated scrub. Although EDP checked the waterbody for GCN (not found), they do not mention that these features – which have remained undisturbed for some time, provide a good continuous block of native habitat which will provide valuable shelter, foraging and breeding opportunities for a range of species including hedgehogs, reptiles, amphibians and birds such as wren which nest close to the ground.

It is not possible to effectively survey dense scrub, as there are many exit and entrance points, and faunal species are likely to move away from any disturbance caused by attempting this. Therefore the value of such habitat often remains under-recorded.

The development as proposed suggests replacing this relatively large area of mainly undisturbed habitat with many smaller, scattered features including a much smaller attenuation pond in a different location.”

The reason for the loss of the pond and surrounding scrub is as a result of the topography of the site and the proposed outfall location. An alternative outfall location is not feasible, without a pumping station, due to the topography of the site and the sloping down towards the eastern end of the site. A Geocellular Storage Tank is required as part of the drainage strategy which can only be installed downstream of another tank and the proposed, above ground, source control SuDS features, such as the attenuation basin located centrally within the site. Therefore, the only possible positioning for the tank and outfall, are in the location of the existing pond.

In addition to this, the loss of the pond also allows for the site to achieve its required number of units to make the scheme deliverable, whilst offering the potential to provide additional biodiversity opportunities within the site and layout.

Owing to the development of the adjacent land, the existing pond location will soon become isolated from the wider landscape as residential units have been approved for construction around the north, south and east of the pond.

Within the layout proposed by Vistry, a new pond and a seasonally wet SuDS basin will be created within the site, which will have better connectivity to the retained orchard adjacent to the site and to the areas of woodland to the south and west. In addition to this, the existing pond is of poor condition owing to its poor water quality, cover of duckweed, high level of shade and lack of aquatic vegetation. The pond and SuDS basins proposed within the development layout will be managed to maximise them for biodiversity value, which can be further detailed within the LEMP. This document will also ensure the long-term maintenance and management of these features to guarantee that they provide as much value as possible for biodiversity utilising the site.

The area of the proposed pond (346 sqm) is also larger than the area of the existing pond (309 sqm), which when combined with the area of the SuDS basin (221 sqm), almost doubles the provision of aquatic features available for biodiversity within the site (at a total of 567 sqm) as well as providing better quality habitats for the reasons described above.

With regards to the loss of the dense scrub currently surrounding the pond, this is dominated by bramble. However, the scrub proposed for planting will comprise a range of mixed native species, which offers a more diverse foraging resource for invertebrates and birds, in addition to the extensive new hedgerow creation across the site which will provide additional refuge opportunities for a range of species. Again, these new habitats will be maintained and managed in line with the LEMP to ensure that they continue to be of value to a range of species and to prevent a single species becoming dominant.

Tree Loss

“The plan also shows the loss of the majority of the broad-leaved trees and proposes replacing them with a mix of ornamental and native ones. The proposals do give descriptions of the mature trees currently present on site, including an oak and two copper beeches which would be lost to the development as proposed, but it would be useful to have at least the mature trees labelled individually on the plan. As with the existing waterbody & surrounding scrub, retaining existing broad-leaved trees wherever possible is preferable in ecological terms, as they are already established, and native species support a wide range of associated fauna – including invertebrates, which ornamental ones do not. In addition, many of our native tree & shrub species are very attractive.”

The proposed tree losses are shown within the AMS produced by Seed (reference: 1400-AMS-V1-B), which details that the species proposed for removal include mainly non-native species owing to the ornamental nature of the site, which was previously a garden. Species proposed for removal include turkey oak, sycamore, copper beech, western hemlock, cypress sp., Douglas fir, western red cedar, cockspur hawthorn, cherry laurel, Portuguese laurel and rhododendron. All of the ash trees and one wild cherry proposed for removal are Category U and would therefore require removal regardless of the development. The exception to this being the loss of four wild cherry trees; however, the proposed planting scheme includes six cherry trees for planting.

As for the planting of a mixture of native and non-native trees, a mixture of native and non-native species will likely be more beneficial for this scheme to ensure the longevity of the tree species planted on-site for biodiversity, biosecurity, disease and climate resilience purposes. Therefore, to prevent the spread of existing and future diseases, it would be beneficial to provide a diverse mixture of trees planted on-site comprising a mixture of native and non-native species, which may be more disease and climate resilient.

Retention and Protection of Existing Native Habitat

“Retention and protection of existing native habitat is preferable to replacing it for a range of reasons including the following:

Larger blocks of native habitat (especially where dense scrub is concerned) provide relatively undisturbed habitat, which is not the case in fragmented areas. Dense scrub helps provide protection from people, domestic pets, mainly cats & dogs – which will inevitably accompany the new residential development.

Native plant species support a range of native fauna – whilst ornamental species largely do not, and can be just as attractive. Whilst a mixture of the two might be appropriate for some parts of the site, using predominantly native species allows for greater ecological BNG, provided on-going long term management is also ensured.

As the proposed access to the site is at the opposite end to the existing waterbody and surrounding scrub, it appears both feasible and preferable to retain it in ecological terms.

Provided the southern portion of the scrub area & a wide border around the waterbody was retained, clearance of a limited area in the northern part (around B4), could provide an attractive and relatively peaceful public open space. A smaller area around retained mature trees could still be retained as is shown on the proposed plan.”

These comments have been addressed above.

Grassland Seed Mixtures

“The majority of the new grassland areas should be of native wildflower-rich species – maybe using the Emorsgate mixture for pasture rather than meadow as suggested where the public are likely to walk.”

I’m unclear as to which mixture you are referring too, although we would be happy to oblige on this point. The landscape design has been carefully designed to ensure that more hard-wearing grasses are sown in areas of high footfall, with a flowering lawn mixture sown in more informal amenity areas and wildflower grassland contained to areas where they can be managed as a meadow.

Building Demolition

“As all existing buildings will be demolished, appropriate mitigation & compensation measures are required for adversely affected faunal species; particularly bats and nesting birds.”

Conditions specifically related to this have been secured on the demolition consent and will need to be adhered to.

Bat and Bird Boxes

“Even though the surveys found only small numbers of roosting bats in the buildings, the principles of BNG should be followed. The proposed plan appears to show a very small number of bat boxes, and all of these except one are sited on retained trees, with only one proposed for a roof. Whilst

these measures are welcome, they do not offer adequate mitigation or compensation. Bat roosting opportunities in buildings (including the use of bat access tiles), have been shown to be more effective than on trees.

Ideally there should be bat access and nesting bird opportunities provided in at least a third of the proposed houses. Such features are relatively inexpensive and much more easily included at the development phase."

Given the size and type of the bat roost, no boxes are required as compensation, however we are proposing to provide six bat boxes and one ridge tile, as well as four bird boxes. Given the small size of the scheme, this seems to be an appropriate level of provision for these species. However, in order to provide provision of nesting opportunities equal to a third of the number of dwellings, we would be willing to include an additional five bat/bird boxes to total 16 units, some of which can be affixed to dwellings.

The overall BNG score delivers a net gain of 1.29 habitat units (7.89%) and 1.89 hedgerow units (2096.03%); this is providing a measurable net gain for biodiversity within the site, that is in line with local planning policy requirements.

I trust this information is now sufficient to address your comments relating to the scheme. Please do not hesitate to contact me should you have any further comments or queries.

Yours sincerely

A handwritten signature in black ink, reading 'Eleanor Delaney' in a cursive script.

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