

Our ref: RED002-004-001

Paul Lester
Redditch Borough Council
Town Hall
Redditch
Worcester
B98 8AH

25th August 2023

Dear Paul,

Review of Planning Application - Land West of Hither Green Lane, Redditch, reference 21/01830/FUL

Background

Thomson Environmental Consultants was approached by Principal Planning Officer, Paul Lester, of Bromsgrove District Council and Redditch Borough Council with a request to review a planning application (reference 21/01830/FUL, hereafter referred to as 'the planning application') submitted to Redditch Borough Council. The planning application is for the erection of a Residential development (Class C3), with a vehicular access point onto Hither Green Lane, play areas, public open space including footways and cycleways, sustainable urban drainage systems and all other ancillary and enabling infrastructure. The application proposes 214 dwellings.

The site is located at National Grid Reference SP043693 and has an area of approximately 9.8 ha, comprising a former golf course with areas of modified and semi-natural grassland, ponds and areas of Woodland, bound on all sides by hedgerows. The site is located on the northern fringe of Redditch, in a landscape comprising a mix of arable and pasture land, other golf courses and sub-urban residential developments.

Redditch Borough Council commissioned Thomson Environmental Consultants (Thomson) on 6th June 2023 to undertake a review of ecological and biodiversity information for the planning application. The brief is provided below:

- The applicant has submitted a Framework Biodiversity Net Gain Plan and Biodiversity Metric prepared by Middlemarch to support the application. Thomson Environmental Consultants will review these documents and provide comments to the Local Planning Authority.

Method

A technical review of the ecological information that has been submitted as part of the planning application has been undertaken, to ensure that all ecological aspects have been appropriately considered prior to determination.

The Local Planning Authority (LPA) has a duty to conserve biodiversity in line with the planning and legislative context. We have reviewed the relevant application documents submitted on the planning portal and assessed these against published best practice guidance to determine whether the submitted information was sufficient for the LPA to assess the planning application. We have also assessed the proposals against relevant legislation and planning policy and recommended an appropriate course of action to ensure the LPA is fulfilling its duty to conserve biodiversity.

This review is valid for up to one year. Should further project information or amended designs be provided or submitted to the planning portal we may need to update our response accordingly.

Review of documents

We have reviewed the following documents:

- Framework Biodiversity Net Gain Plan (RT-MME-159232-Rev C) (Middlemarch, July 2023)
- Biodiversity Net Gain Metric (RT-MME-153943) (Middlemarch, July 2023)

Further documents referenced in the above documents include the following. These were not fully reviewed.

- Preliminary Ecological Appraisal (Report RT-MME-152753-03-Rev B);
- Preliminary Bat Roost Assessment (Report RT-MME-153160-01);
- Badger Survey (Report RT-MME-153160-02);
- Great Crested Newt eDNA Survey (Report RT-MME-153160-03);
- Breeding Bird Survey (Report RT-MME-153160-04);
- Reptile Survey (Report RT-MME-153160-05);
- Wintering Bird Survey (Report RT-MME-153160-07);
- Construction Ecological Management Plan (Report RT-MME-153160-06-Rev B); and
- Biodiversity Net Gain Concept Plan at Abbey Park Hotel Golf Course (Report RT-MME157753);
- Hither Green - Proposed Site Layout (Drawing ME-24- 21Z;
- Hither Green - Landscape Masterplan (Drawing HG-42- REV4);
- Hither Green - Preliminary Drainage Strategy and Finished Floor Levels (Drawings 21169 1-3 H); and
- Hither Green Arboricultural Impact Assessment Report (RT-MME-153943-02-Rev D).

These reports are overall of a high standard. In particular, the proposals for blocks of woodland and boundary hedgerows to be embedded into the design, as opposed to being removed and replanted, is well received.

Issues requiring a specific response are included in the Recommendations table below.

Recommendations

A summary of our advice and recommendations is provided in Table 1.

Table 1: Summary of Recommendations

Planning Stage	Recommendations
Prior to determination	<ul style="list-style-type: none"> • Clarification is required as to why Metric 3.0 was used, instead of the newer 3.1 or 4.0 metrics. It is assumed that this is due to continuity with previous metrics that were produced at the start of the project; however, this choice is not addressed in the report. • Section 2.3: Have the impacts of increased recreational use of surrounding habitats been considered for the various receptors? Impacts may include walking/trampling of habitats, noise disturbance, predation and disturbance by pets etc.? • Section 6.3: The justification for 'cross-trading' of habitats, i.e. replacing grassland habitats with woodland and scrub of equal or higher Biodiversity Units (BU) score, is acceptable. However, consideration should also be given to including some high distinctiveness grasslands, such as Floodplain Wetland Mosaic and Coastal and Floodplain Grazing Marsh (FWM-CFGM), or acid/calcareous grassland (subject to the presence of suitable soil conditions), as well as the high distinctiveness Woodland and Reedbeds habitats. Although these grassland habitats may not result in as high BU score per area unit as woodland, they require a significantly shorter time to mature and therefore will establish and provide their full benefit to wildlife sooner than the woodland habitats. • It is recommended that a Section 61 Notice is established to safeguard the off-site compensation area from future developments, and to ensure the delivery of the 30-year management and maintenance requirement.
Prior to commencement (suggested Conditions)	<ul style="list-style-type: none"> • CONDITION: A Construction Ecological Management Plan (CEMP) (RT-MME-153160-06 or a subsequent revision thereof) must be approved by the LPA prior to commencement of the works and must be implemented in full. • REASON: to minimise negative impacts on ecological receptors during construction.
	<ul style="list-style-type: none"> • CONDITION: A drainage strategy will be produced and be approved by the LPA prior to the commencement of the works. The drainage strategy will include long-term maintenance of the drainage systems and the mitigation measures for the River Arrow.

Planning Stage	Recommendations
	<ul style="list-style-type: none"> • REASON: To ensure the continued function of the river as an important wildlife corridor and to mitigate the impacts on the integrity of the River Arrow Local Wildlife Site. <hr/> <ul style="list-style-type: none"> • CONDITION: A Landscape and Ecology Management Plan (LEMP) will be produced and be approved by the LPA prior to commencement of the works. This LEMP will include (though not be limited to) the following: <ul style="list-style-type: none"> ○ All information and measures outlined within Section 5 of the Framework Biodiversity Net Gain Plan (RT-MME-159232-Rev C); ○ Management measures covering a period of 30 years minimum post-construction; ○ The number, types and locations of ecological enhancement features, including (but not limited to) bat and bird boxes, compost heaps; ○ Kerbs for amphibians to be implemented within the design; and ○ Provision of hedgehog passes in boundary fences to link garden spaces along the route of the secondary dispersal corridors (which will also benefit amphibians and reptiles). • REASON: To ensure the long-term management, maintenance, and monitoring of on-site habitats, with respect to the BNG targets, and to the species that the habitats will support. <hr/> <ul style="list-style-type: none"> • CONDITION: A Habitat Enhancement Management Plan (HEMP) will be produced and be approved by the LPA prior to commencement of the works. This HEMP will include measures to create or enhance existing habitats within the BNG off-setting site. The HEMP will cover a period of 30 years (at minimum) post-construction. • REASON: To ensure the long-term management, maintenance, and monitoring of off-site habitats, with respect to BNG condition targets, and to safeguard the area from future development. <hr/> <ul style="list-style-type: none"> • CONDITION: A sensitive lighting plan will be produced and be approved by the LPA prior to commencement of works. This lighting plan shall include the measures detailed within Section 4.1 of the Framework Biodiversity Net Gain Plan (RT-MME-159232-Rev C). • REASON: to avoid the negative effects of lighting on retained trees, hedgerows and water courses during both construction and operation of the site, and thereby minimise negative impacts of the development on bats, birds, badgers, otters and other nocturnal species.
Prior to occupation N/A	<ul style="list-style-type: none"> • N/A

I hope this information is helpful in assisting your consideration of the application. Please do not hesitate to contact us if you require any further clarifications regarding the above.

Yours sincerely,



David Sweeting

Principal Ecologist
Thomson Environmental Consultants