

14th February 2013

Agenda Item: 5

REPORT OF GROUP MANAGER, PLANNING

STRATEGIC PLANNING OBSERVATIONS ON AN OUTLINE PLANNING APPLICATION FOR A MIXED USE DEVELOPMENT, KIMBERLEY/EASTWOOD BYPASS, NUTHALL

Purpose of the Report

1. To seek Committee approval for comments set out in this report to be sent to Broxtowe Borough Council (BBC) in response to the request for strategic planning observations on the above planning application for a mixed use development.

Information and Advice

2. An outline planning application (with all matters reserved, except for means of access) was submitted to Broxtowe BC on the 21st November 2012 for the construction of a mixed use development (outdoor multi-sport, lifestyle and recreation facility) incorporating 2 N° buildings (5655sqm and 4535sqm) (Class A1 (Sports retail) A3/D1/D2 or garden centre (with additional outdoor sales area and polytunnels/glass houses), a multi sports building (Class D2), sports facilities and open space, construction of new vehicular access, car parking and associated works, by GVA on behalf of Sportstock Ltd. A site plan is provided at Appendix 1.
3. Nottinghamshire County Council (NCC) has been consulted for strategic planning observations on the application and this report compiles responses from Departments involved in providing comments and observations on such matters. On the basis of Committee's decision, comments will be sent to Broxtowe Borough Council in their role as determining planning authority for this application.
4. The planning application is accompanied by an Environmental Statement, Design and Access Statement and a range of other supporting documents. This report is based on the information submitted with the application in the context of national, regional and local policy.
5. The application site lies within the Nottinghamshire Green Belt.

Description of the Proposed Development

6. Layout of the proposed development will be determined at reserved matters, and included the following:
 - Activity Park
 - 2 junior grass football pitches
 - All-weather 3G football centre
 - 4 tennis / netball courts
 - 1.2km closed circuit cycle track
 - Cycle practice area
 - Surfaced activity way
 - Multi-use community games area
 - Tree climbing experience (high ropes)
 - Adventure Golf area
 - Urban sports area “Passion” stadium
 - Childrens play areas
 - 2 N° buildings (5655sqm and 4535sqm) (Class A1 (Sports retail) A3/D1/D2 or garden centre (with additional outdoor sales area and polytunnels/glass houses)
7. It is envisaged that the proposed development will be laid out into 4 distinct zones, as follows:
 - **The Hub or Heart of the Village**, which occupies the north east of the site and comprises all of the proposed built development, the Village Square, a children’s games / multi-sport area, associated car parking and delivery yard. A bus drop off point, with shelter and timetable information would also be situated in this zone, outside the Main Building
 - **Activity Park**, which occupies the north west of the site, and comprises an extensive area of parkland providing space for informal sport and recreation
 - **Team Sports**, which comprises all of the formal sports facilities, including football centre, pitches and tennis / netball courts in the south east of the site
 - **Adventure**, which includes the tree climbing experience, closed circuit cycle track and urban sports area in the south west of the site
8. The majority of the application site will be used for the purposes of outdoor sport and recreation (Use Class D2), comprising a range of formal and informal sports and recreational facilities.
9. The proposed built development comprises 3 principal buildings, with a total gross internal floorspace of approximately 12,174m², together with external sales areas and buildings. For the Main and Partner buildings a mix of uses is proposed within the confines of the total floorspace envelope of each building.
10. The proposed main building and is to be operated as a Class A1 Decathlon sports store with a total gross external floorspace of 5,655m² (5,000m² net retail sales). The building would also include ancillary offices (back of house administrative function), meeting rooms etc. It is intended that Decathlon would operate the proposed main building. A range of uses is therefore proposed for the main building as follows:

- Sports retail; Restricted Class A1 store (5000m² net retail sales).
- Garden centre; Sui Generis store (5655m² gross internal) with associated open-air plant sales (8,680m² gross; 2,937m² net retail sales); or
- Non residential institution (Use class D1) or Assembly and Leisure (Use Class D2) (excluding gym or swimming pool)

11. These uses will also be extended to the partner building.

12. The 'Sport Box' has a total gross internal floorspace of 1,984m². This will incorporate a sports hall, visitor changing rooms (for indoor and outdoor sports), and football centre (all Use Class D2), together with ancillary café.

13. Vehicular access to and from the site is proposed to be provided via a new junction on the A610 centred on the existing underpass at the approximate mid-point along the site's northern boundary. This will comprise a left-in diverge arrangement, together with a two-stage signal controlled junction allowing traffic to turn right into the site and exit both right and left onto the A610.

14. On exiting the A610, incoming traffic will be routed along an internal access road to an at-grade car park in the north east corner of the site which will provide designated parking spaces. In addition, a separate overflow car park providing further spaces is proposed for use during large events (typically 4-6 times a year).

15. Pedestrian and cycle access is proposed via an existing right of passage running through the underpass beneath the A610. This would be upgraded as part of the proposed development to provide a minimum 3m wide footway / cycleway link to Kimberley Road, where there are existing bus services connecting to the NET stop at Phoenix Park. It will also connect to a further section of new off-road footway / cycleway proposed on the southern side of Nottingham Road, which links to the existing Nottinghamshire cycle network. Cycle parking spaces will be provided on the site.

16. Public transport access is proposed via a new bus service routing between the site and the NET terminus at Phoenix Park, via Nuthall.

17. It is proposed that the development will be open to the public 7 days a week from 07:00 to 23:00, with the retail operations restricted to the hours of 09:00 to 20:00.

Planning Policy Context

National Planning Policy Framework (NPPF)

18. One of the core principles of the National Planning Policy Framework (NPPF) is to support and deliver economic growth to ensure that the housing, business and other development needs of an area are met. The principles and policies contained in the NPPF also recognise the value of and the need to protect and enhance the natural, built and historic environment, biodiversity and also include the need to adapt to climate change.

19. A key aspect of the NPPF is that it includes a presumption in favour of sustainable development which means that, for decision-taking, local planning authorities should approve development proposals that accord with the development plan without delay or where a development plan is absent, silent or out of date, grant permission unless any adverse impacts of the proposal outweigh the benefits, or specific policies in the NPPF indicate that development should be restricted.
20. The NPPF also discusses the weight that can be given in planning determinations to policies emerging as the local authority's development plan is being brought forward. The weight given to these policies will be very dependant on; their stage of preparation, the extent to which there are unresolved objections and the degree of consistency with the NPPF.

East Midlands Regional Plan (RS)

21. On the 6th July 2010 the Secretary of State announced the revocation of Regional Strategies. However, following a legal challenge Regional Strategies (RS) have been reinstated and the RS therefore remains part of the statutory development plan for the purposes of determining planning applications within the Broxtowe Borough Council area. Nevertheless, the intention of the Government to abolish Regional Strategies, through the enactment of the Localism Bill, may be taken into account as a material consideration in the determination of planning applications. In any event, in cases where national and local planning policies align with RS policy on the issue, there is no material difference in the advice that results.
22. The RS is in line with National Planning Policy in terms of delivering sustainable development.
23. Policy 31 of the RS ensures that the Region's landscape be protected from inappropriate development and where possible enhanced. RS Policy Three Cities SRS 2 identifies that the principle of the Green Belt will be retained but a comprehensive review of the most sustainable locations for growth will be required.

Strategic Planning Issues

The Green Belt

24. The NPPF sets out a list of acceptable developments within the Green Belt, new development is not considered to be acceptable development in the Green Belt, unless (NPPF paragraph 89) it is for the provision of appropriate facilities for outdoor sport or outdoor recreation, and as such the onus lies with the applicant to demonstrate that there are very special circumstances to justify such inappropriate development in such a location.
25. The applicants set out in Section 5, paragraphs 5.61-5.90 of their Planning Statement (November 2012) the reasons why they consider their development does not harm the Green Belt and conclude that the health and well being benefits, delivery of economic growth and the provision of improvements to the

local highway network of the proposal coupled with the that fact that there are no suitable alternative sites provides sufficient justification for the proposal to be granted planning permission.

26. The County Council consider that the proposed development constitutes inappropriate development within the Green Belt and is therefore contrary to paragraph 89 of the NPPF as such the County Council raises objections to the proposal on these grounds.

Retail

27. The NPPF sets out in Section 2 the Government's approach to retail/town centre development and encourages local planning authorities to place significant weight on the need to support economic growth and support the vitality and viability of town centres. As the above proposal lies outside of a defined town centre the applicants, in accordance with the sequential tests of the NPPF have submitted a Retail Planning Statement and a Town Centre Impact Assessment.
28. The Retail Planning Statement and a Town Centre Impact Assessments conclude that the proposed development would not negatively impact upon local town centres, provided suitable planning conditions are attached to the grant of any planning permission.
29. It is considered that the applicants have provided a sufficient assessment of alternative sites and have followed advice contained in NPPF. However, I would wish to see this evidence independently tested and therefore I do not currently support this element of the proposal.

Landscape

30. The application boundary runs through a Conservation Area concerns are raised over the detail contained within the submitted Heritage Impact Assessment and it is considered that further examination of the impacts of the proposal is carried out in relation to the Conservation Area, as set out in paragraph 128 of the NPPF.
31. In addition to this the whole of the application site lies within the former historic park and garden of Nuthall Temple, this is identified by the County Historic Environment Record (HER) and should be given consideration as an undesignated heritage asset, as set out in paragraph 135 of the NPPF.
32. It is considered that there is insufficient information to provide adequate assessment of the potential impacts on the character of the Conservation Area and the setting of the Listed Buildings in the vicinity of the site.
33. Detailed comments in relation to landscape issues for the County Council are set out in Appendix 2.

Rights of Way

34. The Countryside Access Team supports the principles and design ideas of the proposed development. There are no definitive rights of way crossing the site but it is always possible that public rights of way may exist which have not yet been recorded.

35. Detailed comments in relation to Rights of Way issues for the County Council are set out in Appendix 3.

Transport

36. County Council Highways are currently in discussion with the applicants Transport Consultants, however, the County Council will not be raising any highway objections to the proposal and that subject to a number of conditions will be recommending the application for approval.

Developer Contributions

37. There are no education implications resulting from this development.

Ecology

38. The County Council wish to raise objections on ecological ground to the proposal until the matters set out below are adequately addressed:

- It is stated that no evidence of roosting bats was found during the daytime or evening surveys, but it is unclear if an emergence/re-entry survey or a climbing inspection was carried out; further details are therefore required. Furthermore, the Arboricultural Implications Assessment report also identifies trees with bat roosting potential, but these do not appear to correspond with those as shown on the Phase 1 map. This needs addressing, along with confirmation as to whether or not these trees are to be retained in accordance with the Tree Constraints Plan.
- No evidence of reptiles was found on the site. However, it should be noted that the survey took place outside the optimum survey period (which is April/May and September), and no plan is provided showing where the reptile tins were placed (submission of the latter would be welcomed). Details to this effect would be welcomed.
- It is stated that an Ecological Mitigation Plan and Arboricultural Method Statement will be prepared and implemented for the duration of the construction works. This should be made a **condition** of any permission granted, and should detail measures for the protection of retained features including hedgerows, woodland and individual trees.
- A detailed lighting scheme should be prepared (as recommended in the ES), to ensure that impacts on foraging bats are avoided; this should be made a **condition** of any permission granted.

- A standard **condition** should be used to control vegetation clearance during the bird nesting season (which runs from March to August inclusive).
- A **condition** should be used to require the submission of a detailed landscaping scheme showing the location of these habitats, along with details of species mixes, establishment methods and aftercare maintenance regimes, with a commitment made to using native species appropriate to the local area and stock which is of native genetic origin (and ideally of local provenance). Further to this the production of a site Management Plan should also be **conditioned**, which sets out how created habitats will be maintained in the future (e.g. mowing regimes) to ensure that the biodiversity value of the site is maximised.
- In addition, it is noted that there is some blue line land immediately north of the A610, next to Temple Lake; the Phase 1 habitat maps suggests this is species-poor semi-improved grassland and bare ground. Works to enhance this area (e.g. by establishing a more species-rich grassland) would be welcomed, which would further help to offset the overall loss of habitat area arising from the development.

39. Detailed comments in relation to Ecology issues for the County Council are set out in Appendix 4.

Other Options Considered

40. This report considers all of the relevant issues in relation to the above planning applications which have led to the recommendations, as set out below. Alternative options considered could have been to express no or full support for the application.

Reason/s for Recommendation/s

41. The County Council consider that the proposed development constitutes inappropriate development within the Green Belt and is therefore contrary to paragraph 89 of the NPPF and as such the County Council raises objections to the proposal on these grounds.

42. It is recommended that the County Council object to the proposal on the grounds that insufficient information has been submitted with the planning application to allow valid and robust conclusions to be drawn on the applications potential impact upon the landscape, historic environment and ecology of the County. These concerns can not be addressed until further information has been provided by the applicant.

43. If Broxtowe Borough Council is minded to approve the application, Nottinghamshire County Council request that the detailed concerns set out in this report and detailed in officer comments are addressed prior to planning

permission being granted and that planning permission is only granted subject to conditions and a Section 106 agreement requiring planning contributions in relation to highways.

Statutory and Policy Implications

44. This report has been compiled after consideration of implications in respect of finance, the public sector equality duty, human resources, crime and disorder, human rights, the safeguarding of children, sustainability and the environment and those using the service and where such implications are material they are described below. Appropriate consultation has been undertaken and advice sought on these issues as required.

Financial Implications

45. There are no direct financial implications.

Implications for Sustainability and the Environment

46. There are no direct implications for Sustainability and the Environment.

RECOMMENDATION/S

- 1) The County Council wish to raise objection to the proposal as the development constitutes inappropriate development within the Green Belt and as such in contrary to National Planning Policy and the County Council request that Broxtowe Borough Council be advised that Nottinghamshire County Council objects to the proposal as insufficient information has been submitted with the planning application to allow valid and robust conclusions to be drawn on the applications potential impact upon the landscape and visual impact and ecology of the County.

Sally Gill, Group Manager, Planning

For any enquiries about this report please contact: Nina Wilson, Principal Planner (Planning Policy) – 0115 977 3793

Constitutional Comments (SHB22.01.13)

47. Committee have power to decide the Recommendation.

Financial Comments (DJK 22.01.2013)

48. The contents of this report are duly noted; there are no financial implications.

Background Papers

Except for previously published documents, which will be available elsewhere, the documents listed here will be available for inspection in accordance with Section 100D of the Local Government Act 1972.

The following link provides access to all the relevant planning application documents used to inform the above report:

[http://planning.broxtowe.gov.uk/\(S\(eqcr1c55jaqjfg550qce0045\)\)/ApplicationDetail.aspx?RefVal=12/00644/OUT](http://planning.broxtowe.gov.uk/(S(eqcr1c55jaqjfg550qce0045))/ApplicationDetail.aspx?RefVal=12/00644/OUT)

Electoral Division(s) and Member(s) Affected

Councillor David Taylor - Beauvale

Councillor Steve Carr – Beeston North

Councillor Eric Kerry – Beeston South and Attenborough

Councillor Stan Hepinstall MBE and Councillor Brian Wombwell– Bramcote and Stapleford

Councillor John Doody and Councillor Richard Jackson – Chilwell and Toton

Councillor Keith Longdon – Eastwood

Councillor Ken Rigby – Kimberley and Trowell

Councillor Phillip Owen – Nuthall

Appendix 1 – Site Location Plan

Appendix 2 – Landscape Comments

Oxylane Sports Village Proposal – Ref: 12/00644/OUT

Thank you for opportunity to comment on the above proposal.

The Application Site.

The area of the majority of the application site lies adjacent to the Nuthall Conservation Area (C.A), whilst the element of the application site relating to cycle and pedestrian access cuts through the conservation area and runs adjacent to several listed buildings. This is not made clear within the design and access statement section on heritage and physical context which omits the access route section of the application boundary.

As the application boundary runs through the C.A I would raise the question as to whether a proper Heritage Impact Assessment should be considered. I would not consider the existing information to fulfil the requirement in line with the NPPF

NPPF 12 128. “In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes or has the potential to include heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation”

In addition to this the whole of the application site lies within the former historic park and garden of Nuthall Temple, this is identified by the County HER and should be given consideration as an undesignated heritage asset.

NPPF 12 135. “The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that affect directly or indirectly non designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset”.

Potential Impacts

The proposed pedestrian and cycle access follows the route of a largely unsurfaced farm track through pastoral land forming part of the historic park and garden. It joins Nottingham road within the historic core (As identified on Sanderson’s Map, 1835) of Nuthall Village and is shown to then bear east to join an existing route that currently terminates outside the C.A.

A surfaced track through the existing green landscape and creation of a roadside cycle lane would undoubtedly have potential for adverse impact upon the character of the Conservation Area and the setting of the Listed Buildings in the vicinity. Hard surfacing, landscaping and any associated infrastructure such as signage, safety barriers, lighting etc could add additional clutter to the streetscene in the village core as well as urbanising the greener areas of the C.A.

There is not sufficient information to accurately judge to what extent this impact would be within the details of the Outline application.

The route would also run alongside the group of listed buildings that it currently provides access to (Home Farm) which appear on the County Council Heritage at Risk Register. The land shown in the application site is either currently or historically strongly associated with these buildings. In accordance with section 12 of the NPPF

NPPF 12 129. "Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this assessment into account when considering the impact of a proposal on a heritage asset, to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal".

With this in mind the impact of any change to the land ownership/access rights should be considered as to whether this would have a negative impact on the future viability of these listed buildings, whilst due consideration should also be given to the material impact on the setting of the buildings.

Considering the absence of detail and heritage impact assessment I am concerned as to whether the impacts can be gauged.

The majority of the application site is located on a parcel of land to the south of the A610. Historically this parcel of land was part of the parkland associated to Nuthall Temple. There are surviving landscape forms which relate to this, for example, the line of trees running through the site and the Verge Wood are present on the 1835 Map. As part of an undesignated heritage asset the removal of such features should be given consideration in accordance with NPPF policy.

The proposed buildings reach a height of 9 metres and are of an industrial scale. I feel that there is potential impact on views in an out of the conservation area. Unfortunately there is not enough analysis of setting issues within the Heritage element of the D & A to fully explore this.

Recommendations

If as is indicated the cycle/pedestrian access is part of the application site then a proper heritage impact assessment should be requested with which the potential effects upon heritage assets can be fully considered and any appropriate mitigation presented, especially with regard to the Buildings at Risk. I also feel that the potential setting impact on views to and from the C.A

is of enough concern to warrant some consideration in this. Considering the nature of this application I wonder if it would be appropriate for English Heritage to have been consulted. It seems a little hard to judge from the information submitted but it seems that the access would appear to constitute a site in excess of 1000m sq within a conservation area. Certainly the area of the land owned by the applicant inside the C.A is in the region of 1000m sq.

Guidance states that English Heritage must be consulted on planning, listed building and conservation area applications when:

“(b) Development which in the opinion of the local planning authority affects the character or appearance of a conservation area and which involves:

(i) the erection of a new building or the extension of an existing building where the area of land in respect of which the application is made is more than 1,000 square metres;”

This is as set out in the 1990 Planning Act (Listed Buildings and Conservation Areas).

I hope these comments are helpful, if you require any further information or clarification please contact me.

Kind Regards

David Littlewood
Historic Buildings Conservation Officer
Nottinghamshire County Council

Appendix 3 – Rights of Way Comments

Thank you for the opportunity to comment on the above application.

The Countryside Access Team very much supports the principles and design ideas of the proposed development. There are no definitive rights of way crossing the site but it is always possible that public rights of way may exist which have not yet been recorded.

Best wishes

Jenny Romero
Rights of Way Officer (Broxtowe and Ashfield areas)

Appendix 4 – Ecology Comments

Thank you for consulting the Nature Conservation Unit of the Conservation Team on the above matter. We have the following comments regarding nature conservation issues, made with reference to Chapter 11 of the ES, the ES Non-technical Summary, the ES Appendix VIII and IX and associated plans:

Designated sites

The desktop study identified to presence of three SINCs adjacent to the development site, which have the potential to be affected by the development;

- Verge Wood SINC 2/317
- Temple Lakes Wood SINC 2/306
- Temple Lake SINC 1/31

The nearest SSSIs, Kimberley Railway Cutting SSSI and Sellers Wood SSSI, both lie approximately 1.4km away (to the north-west and north-east respectively). No impact on these sites can be expected.

Surveys

A desktop study has been completed, along with a Phase 1 Habitat Survey and a number of species surveys. The surveys were completed in Spring/Summer 2011, and as such can be considered to be up-to-date.

The Phase 1 Habitat Survey identified that the predominant habitat on site is species-poor semi-improved grassland extending to approximately 22ha, with semi-natural broad-leaved woodland along the western and southern site boundary (Verge Wood). Other habitats on site or in the immediate vicinity include plantation broad-leaved woodland, scrub, scattered broad-leaved trees and hedgerows, with lake and swamp habitat around Temple Lake to the north.

In terms of species, a number of surveys have been carried out:

Great crested newts

Reference is made to an 'evening survey assessment' of Temple Lake undertaken in May 2010. It is unclear what this survey entailed, and further details should be provided. However, it is noted that Temple Lake is stocked with coarse fish, which reduces the likelihood of great crested newts being present, and the development site itself is isolated from land to the north and east by the A610 and M1, which will be major barriers to the dispersal of amphibians.

Bats

Two bat activity surveys were carried out in July 2011. It would appear that the level of survey does not comply with current Bat Conservation Trust (BCT) guidelines (Bat Surveys Good Practice Guidelines – 2nd edition, as detailed in Table 7.2), so further

comment on this is required. The completed surveys found a relatively low level of bat activity, primarily associated with the woodland edge and Temple Lake.

Reference is also made to three mature oaks trees located in the centre of the site which offer 'minor' bat roost potential. Further details are required which properly categorise the value of these trees, with reference to Table 8.4 of the BCT guidelines. It is stated that no evidence of roosting bats was found during the daytime or evening surveys, but it is unclear if an emergence/re-entry survey or a climbing inspection was carried out; further details are therefore required. Furthermore, the Arboricultural Implications Assessment report also identifies trees with bat roosting potential, but these do not appear to correspond with those as shown on the Phase 1 map. This needs addressing, along with confirmation as to whether or not these trees are to be retained in accordance with the Tree Constraints Plan.

Reptiles

No evidence of reptiles was found on the site. However, it should be noted that the survey took place outside the optimum survey period (which is April/May and September), and no plan is provided showing where the reptile tins were placed (submission of the latter would be welcomed). Details to this effect would be welcomed.

Badgers

No evidence of badgers was found on the site or in the immediate vicinity.

Breeding birds

The breeding bird survey did not locate any notable species at the site or in the immediate surroundings. However, it should be noted that only two survey visits were undertaken (instead of three), with a visit in April/May being missed.

Impacts, mitigation and enhancement

Notwithstanding any further details which may be submitted in response to our comments above, it appears that the nature conservation value of the development site is low, and a range of mitigation measures are proposed. In particular:

- It is stated that an Ecological Mitigation Plan and Arboricultural Method Statement will be prepared and implemented for the duration of the construction works. This should be made a **condition** of any permission granted, and should detail measures for the protection of retained features including hedgerows, woodland and individual trees
- A detailed lighting scheme should be prepared (as recommended in the ES), to ensure that impacts on foraging bats are avoided; this should be made a **condition** of any permission granted.
- A standard **condition** should be used to control vegetation clearance during the bird nesting season (which runs from March to August inclusive).

In terms of mitigation for the loss of habitat on the development site, the ES states that new landscaping associated with the development will, as a minimum, create

approximately 2ha of woodland, 0.65ha of scrub, 3ha of grassland, 3ha of wildflower meadow and 250m of swale/ditch. On balance, this level of habitat creation appears sufficient to offset the net loss of habitat arising from the development. A **condition** should be used to require the submission of a detailed landscaping scheme showing the location of these habitats, along with details of species mixes, establishment methods and aftercare maintenance regimes, with a commitment made to using native species appropriate to the local area and stock which is of native genetic origin (and ideally of local provenance). Further to this the production of a site Management Plan should also be **conditioned**, which sets out how created habitats will be maintained in the future (e.g. mowing regimes) to ensure that the biodiversity value of the site is maximised.

In addition, it is noted that there is some blue line land immediately north of the A610, next to Temple Lake; the Phase 1 habitat maps suggests this is species-poor semi-improved grassland and bare ground. Works to enhance this area (e.g. by establishing a more species-rich grassland) would be welcomed, which would further help to offset the overall loss of habitat area arising from the development.

Other issues

It is apparent that a cyclepath will enter the site from the north (passing under the A610). The potential impacts of this cyclepath do not appear to have been considered, which needs addressing.

The development appears to provide a good opportunity to use green roof technology on the main buildings on the site. This would have wildlife value, and would also help the building integrate better into the surrounding landscape.

We trust you will find the above comments of use, but if you require any further information, please do not hesitate to contact us.

Nick Crouch
Senior Practitioner Nature Conservation

