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BY EMAIL ONLY

Dear Sir/Madam

**Village Housing Options and Settlement Boundaries Consultation
Warwick District Council November 2013**

Thank you for your consultation on the above dated 26 November 2013 which was received by Natural England on the same date.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England generally welcomes the site selection process and methodology. We particularly welcome the use of bespoke research on landscape impact, habitat and species impact and the function and performance of green field parcels. We have the following specific comments to make.

Hatton Park

We note that the preferred site in Hatton Park would isolate Smith's Covert, an area of Ancient Semi-Natural Woodland. Isolating habitats can have a negative effect on their functioning, restricting natural processes and preventing species movements. Encircling the woodland with development could also increase pressures from recreation and anti-social behaviour.

This could generally be considered to be a move in the wrong direction; the National Planning Policy Framework promotes the protection and re-establishment of ecological networks (paragraphs 109 and 117), as does the Lawton Review, Making Space for Nature: A review of England's Wildlife Sites and Ecological Network (2010).

We recommend that the local authority considers the potential ecological impacts on Smith's Covert. If the local authority is minded to proceed with this allocation then we recommend that the proposed masterplan for the site is required to include measures to reduce the effects of the isolation of Smith's Covert as far as is possible. This could include providing green links through the new development into the wider countryside, including by utilising landscaping and soft SuDS, thereby providing multifunctional green infrastructure.

Hatton

Our internal information systems indicate that preferred site 1 in Hatton could include an area of Priority Habitat. However, our system does not indicate what this habitat is. We therefore

recommend your authority undertakes its own investigations. If Priority habitat is confirmed on this site then you should take steps to secure its protection and enhancement as a part of this site's green infrastructure.

This would be in accordance with paragraphs 109 and 117 of the National Planning Policy Framework (provided below) and with the biodiversity duty on public bodies, set out in the Natural Environment and Rural Communities Act (2006) (the NERC Act).

109. The planning system should contribute to and enhance the natural and local environment by: minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures (NPPF)

117. To minimise impacts on biodiversity and geodiversity, planning policies should: promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations, linked to national and local targets, and identify suitable indicators for monitoring biodiversity in the plan (NPPF)

Priority habitats are listed in Section 41 of the Natural Environment and Rural Communities Act 2006 and may be covered in the UK and Warwickshire Biodiversity Action Plans. Section 40 of the NERC Act sets out a 'biodiversity duty' for all public bodies; *"Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity"*. Section 40(3) clarifies that *"conserving biodiversity includes, in relation to a living organism or type of habitat, restoring or enhancing a population or habitat"*.

Leek Wootton

Our internal information systems indicate that the preferred sites are located within an area of wood pasture and parkland, which is a Priority Habitat. Whilst we note that sites 3 and 4 are on brownfield sites, sites 1 and 2 are not, and development here may have the potential to result in losses of Priority Habitat. Sites 1 and 4 are also adjacent to The Lunch local site, which forms a corridor with Woodcote Woodland and Cattle Brook from Wedge Rock Rifle Range local site to the River Avon.

The local authority should take the potential ecological implications of these site allocations into account when reaching its decision, considering paragraphs 109 and 117 of the NPPF and the biodiversity duty established under the NERC Act 2006. If the sites remain the preferred option then we would recommend requiring site masterplanning and specifying the need to design-in habitat retention and enhancement.

Shrewley

We note that the preferred site abuts the Railway Cutting local site. The local authority should satisfy itself that the allocation would not impact on this local site.

Additional subjects for consideration

We recommend that the local authorities takes the following additional environmental issues into consideration:

Avoiding Best and Most Versatile Agricultural Land

Land quality varies from place to place. Information on Best and Most Versatile Agricultural land (grades 1,2 and 3 a) is available from the Agricultural Land Classification (ALC) .ALC maps are

available on the [MAGIC](#) website. Not all land has been surveyed in detail and more detailed field survey may be required to inform decisions about specific sites. Further information is available here [ALC](#).

Seeking opportunities to enhance public rights of way and accessible natural green space.

Housing allocations should avoid adverse impacts on National Trails and networks of public rights of way and opportunities should be considered to maintain and enhance networks and to add links to existing rights of way networks including National Trails. More information is available here [National Trails](#).

Accessible natural greenspace should be provided as an integral part of development. Further information is set out in . Our Accessible Natural Greenspace Standard (ANGSt) which describes the amount, quality and level of visitor services we recommend for all areas. More information here [Accessible Natural Greenspace Standard](#).

Seeking opportunities to enhance and create Green Infrastructure

Green infrastructure is a term used to refer to the living network of green spaces, water and other environmental features in both urban and rural areas. It is often used in an urban context to provide multiple benefits including space for recreation, access to nature, flood storage and urban cooling to support climate change mitigation, food production, wildlife habitats and health & well-being improvements provided by trees, rights of way, parks, gardens, road verges, allotments, cemeteries, woodlands, rivers and wetlands.

Green infrastructure is also relevant in a rural context, where it might additionally refer to the use of farmland, woodland, wetlands or other natural features to provide services such as flood protection, carbon storage or water purification. Green infrastructure maintains critical ecological links between town and country.

The SHLAA should consider the availability of GI and opportunities to enhance GI networks when considering sites for development.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries relating to the specific advice in this letter only please contact Hayley Fleming on 0300 060 1594. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

We really value your feedback to help us improve the service we offer. We have attached a feedback form to this letter and welcome any comments you might have about our service.

Yours faithfully

Hayley Fleming
Land Use Operations (Development Plans Network)