

Planning Policy
Warwick District Council
Riverside House
Milverton Hill
Royal Leamington Spa
CV32 5QH

20th December 2018

Dear Sir or Madam,

RE: Land East of Kenilworth Development Brief – Response to Consultation

Warwickshire Wildlife Trust is a wildlife conservation charity, and as such our comments relate specifically to the protection and enhancement of wildlife. We have the following comments on this SPD.

Page 57: Vision

In the seventh paragraph we recommend that the wording is amended so that the vision is to 'protect and enhance' existing mature landscaping and woodland, rather than simply 'retain' it.

Page 58: Objectives

The revised NPPF and Government's 25 year plan for the environment are clear that we should be aiming for net gains to biodiversity so as to halt the loss and decline of our natural environment and the services we receive from it.

We therefore recommend that objective 5 is amended to include achieving net gains for biodiversity within the site.

Ancient Woodland Protection

Ancient woodland is irreplaceable and protected by paragraph 175 of the NPPF. The site contains a parcel of ancient woodland; as identified on the constraints plan. However no reference has been made to protecting the ancient woodland from direct or indirect impacts from the proposed development.

We refer you to Natural England's Standing Advice on Ancient Woodland and Veteran Trees and also

Chair
Crishni Waring
Chief Executive
Ed Green

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Warwickshire Wildlife Trust

www.warwickshirewildlifetrust.org.uk

Text 'Giving 70070' with the words 'WKWT01' and the donation amount (e.g. WKWT01 £10) to help support our planning work.

the Woodland Trust's Planner's Manual for Ancient Woodland and Veteran Trees. Both are clear that for large developments such as this a suitable buffer of semi-natural habitat along with other measures should be provided so as to mitigate impacts such as:

- breaking up or destroying connections between woodlands and ancient or veteran trees
- reducing the amount of semi-natural habitats next to ancient woodland
- increasing the amount of pollution, including dust
- increasing disturbance to wildlife from additional traffic and visitors
- increasing light or air pollution
- increasing damaging activities like fly-tipping and the impact of domestic pets
- changing the landscape character of the area

We recommend that specific references to protecting and enhancing the ancient woodland are made throughout the document and that Development Principle 5A is updated to include a paragraph on protecting and enhancing the ancient woodland and other high value ecological features.

Development Principle 5F: Flood Risk

We welcome the requirement for appropriate Sustainable Drainage Systems to be used to minimise flood risk, however we recommend that this paragraph is expanded to state that where possible SuDS should be multifunction and contribute towards biodiversity enhancement and landscape character.

Please contact me if you have any queries regarding this response.

Yours faithfully



Annie Ottaway
Planning & Biodiversity Officer



