

Nigel Smith
The Council House
Earl Street
Coventry
CV1 5RR

1st February 2019

Your ref: OUT/2019/0022

Our ref: CCC_0022_2019

Dear Nigel,

RE: Outline application for the demolition of all existing buildings and the erection of up to 550 dwellings and creation of associated vehicular accesses to Tamworth Road and Fivefield Road, pedestrian/cycle and emergency accesses, diversion of public rights of way, highway improvements to Fivefield Road, parking, landscaping, drainage features, open space and associated infrastructure, with all matters to be reserved except access points into the site. At Land at Fivefield Road and Tamworth Road, Keresley.

Warwickshire Wildlife Trust is a wildlife conservation charity, and as such our comments relate specifically to the protection and enhancement of wildlife on and around the proposed development area. The Trust has the following comments relating to this development proposal.

Warwickshire Wildlife Trust **objects** to this planning application due to insufficient mitigation proposed for the ancient woodland which will lead to the deterioration of this irreplaceable habitat. We have also identified concerns with the net gain (biodiversity impact) calculations and great crested newt mitigation that we recommend are addressed before a decision is made.

Harm to Ancient Woodland

Paragraph 175 of the NPPF is clear that 'development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons'.

Development can impact ancient woodland either directly, via the direct clearance of woodland or indirectly via creating additional recreational pressure, increased predation of woodland species from pets, undesirable behaviour, introducing invasive or problem plants (garden escapees),

Chair
Crishni Waring

Chief Executive
Ed Green

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increased lighting, changes to hydrology and drift of herbicides and pesticides used in residential areas.

Natural England has produced standing advice for ancient woodland; in terms of buffers they say (emphasis added):

*A buffer zone's purpose is to protect ancient woodland and individual ancient or veteran trees. **The size and type of buffer zone should vary depending on the scale, type and impact of the development.***

*For ancient woodlands, you should have a buffer zone of at least 15 metres to avoid root damage. **Where assessment shows other impacts are likely to extend beyond this distance, you're likely to need a larger buffer zone.** For example, the effect of air pollution from development that results in a significant increase in traffic.*

The Woodland Trust recommends using semi-natural buffers that are used to protect ancient woodland from development are a minimum of 50m and in some instances 100m buffers have been advised for developments of this scale.

As the ancient woodland at The Alders and Pikehorne Wood are adjacent to the development and are at risk of more than just root compaction (which is what the 15m would help mitigate), **I recommend that a minimum buffer of 50m of semi-natural habitat is used to ensure that the development does not result in harm to these woods.**

Net gain to biodiversity; the Biodiversity Impact Assessment

I have some concerns regarding the data used to complete the BIA and I therefore recommend that the following are addressed before a decision is made:

- Semi-improved grassland. The Phase 1 habitat report and accompanying map describes the majority of the site as semi-improved grassland. Only 2 smaller fields are stated to be poor semi-improved grassland. I am therefore unclear why most of the grassland has been input into the BIA as B6 rather than B22.
- It is unclear where all the proposed habitats within the BIA are planned to be created/enhanced. The BIA states that 2.12ha of broadleaved woodland will be enhanced; however there is no woodland shown currently on site on the Phase 1 habitat plan, and no new woodland is identified on the illustrative landscape masterplan either. The only tree planting is shown as avenue trees along roads and occasional scattered trees within open-space. Where new woodland planting has been counted as enhancement because the existing habitat is not being destroyed during construction then the ttc should be 32+ years.
- The BIA also states that 6.03ha of semi-improved grassland will be created or enhanced. The landscape master plan is not clear where this is as most of the open-space areas are shown to be amenity grassland with only small areas of meadow grassland shown around the SUDS attenuation basins. However I assume that this is the 0.96ha of marshy grassland within the calculator.

It would be preferable if a clearer landscape and ecology plan were provided and/or the GIS files of the proposed habitat creation so as to have confidence in the areas used within the calculations.

Great Crested Newts (GCN)

A small population of GCN has been identified within offsite pond 5 - just to the east of the development site. The EIA states that mitigation will involve a buffer around this pond to retain suitable terrestrial habitat for the newts here. However, the Illustrative Landscape Masterplan does not clearly show this buffer – there just seems to be a few meters of amenity grassland. There is scope to enhance this area for the GCN by creating tussocky grassland and additional ponds to help better connect them in the landscape.

Hedgerows

I have been unable to locate an assessment of whether the hedgerows meet the criteria to be classed as 'important' under the Hedgerow Regulations (1997). Important hedgerows should be a priority for retention.

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

Yours sincerely

Annie Ottaway

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