



Dear Sir/Madam,

Rugby Local Plan Consultation

Warwickshire Wildlife Trust is extremely concerned regarding the emerging plan and is concerned regarding the scale of housing on land near to our important wildlife sites, key habitat and through wider landscape corridors.

A number of proposed areas of new housing and development are close to important 'Local Wildlife Sites', and the impact on these sites and increased traffic/lighting/noise and activity in these areas would threaten vulnerable wildlife.

We are particularly concerned regarding a number of the housing/ employment allocations such as an allocation south of Leicester Road, directly next to Wolvey Wetlands Reserve and Local Wildlife Site near Wolvey right adjacent to the river Anker habitat an important blue corridor for a number of protected and important species as well as Wolvey Rush Pasture PLWS and Wolvey Trout Pits PLWS.

As well as an allocation for 400 homes in Brinklow in our Dunsmore project area, near to Cawston Woodlands an important allocated Local Wildlife Site, that includes a number of important and protected species for Warwickshire.

We are also extremely concerned regarding the 350,000sqm employment park near Ryton and Dunsmore and near to Siskin Drive Bird Sanctuary designated LWS and important habitats for nature.

Also South West Rugby employment phase 2 has been allocated directly next to Cawston spinney LWS, with no regard for its impact on legally protected species and habitats.

As well as an allocation for 150 homes at Wolvey near to Wolvey Trout Pits PLWS another key wildlife site in Warwickshire. Which should have considered alternative sites in the Sustainability Appraisal.



The large scale Long Lawford housing allocation is on previously included Long Lawford Meadows and is near to PLWS Lawford Heath Meadows a key wildlife habitat that needs preserving for future generations and in line with the Councils NERC duties and the laws in the Wildlife and Countryside Act 1981 protecting important species.

These important site should be considered in detail as part of Sustainability Appraisal, Housing site assessment looking at environmental impacts and GI study.

The plan should also provide a lot more local detail than the national level, such as early work on important green infrastructure corridors, and potential new 'Wildbelt' areas and areas for habitat restoration. Wildbelt is a Wildlife Trust designation that would allocation land for habitat restoration within the plan. This work should be carried out at an early stage to inform the housing locations, rather than just saying this will take place in the future.

The plan also only repeats the existing 10% biodiversity net gain requirement, a number of areas now have 20% net gain biodiversity policies, and this has been achievable on a number of local schemes so has proven to be viable. The Council needs to be serious about meeting the Government target of 30% more land in nature recovery by 2030 in order to reach this.

Whilst WWT are pleased to see a Tree Canopy Target and climate change policies within the plan the plan doesn't go far enough to solve the declared 'Climate Emergency'. The plan should also include 'potential' local wildlife sites as these are often sites with assessment access issues, but are important habitats and should be designated.

WWT is also concerned that there is no specific 'Local Nature Recovery Strategy' policy, just brief mention in the text, as these documents need to be given full weight in order to deliver the governments targets of 30% more land in nature recovery by 2030.

**Chair**

Crishni Waring

**Vice Chair**

Martin Randall

**Chief Executive**

Ed Green



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The document also doesn't go far enough in terms of climate change, especially with the Councils declared 'Climate emergency' and should include grey water policies and street trees, as well as green roofs and sustainable technologies on bus stops and large employment sites.

I hope that these comments will be considered.

