Response from the Warwickshire Wildlife Trust (WWT) to the WDC consultation on the future of Newbold Comyn 30th March to 30th June 2020

Sports

Golf: a golf offer has already failed at Newbold Comyn and is therefore likely to do so again in the future, and no evidence has been provided that the alternative golf offerings are viable or desired by residents/visitors. Reinstatement of a golf offer takes space away from the functions and facilities that the people who use or who would like to use Newbold Comyn have requested through previous consultations and risks the need to manage future commercial failure again in the future.

Football: we are concerned that the floodlighting which will accompany an artificial sports pitch will adversely affect bats for which Newbold Comyn is a very important site and no details are provided to explain how this will be avoided or mitigated. The all-weather and day/night availability of the artificial pitch will reduce the demand for grass pitches and we therefore question whether it is necessary to maintain the same area given over to football.

Cycling: the routes marked out on the masterplan must only be planned once the design of the habitat creation is understood in detail, so that cycling does not compromise the biodiversity enhancements or the access by any vehicles or livestock which are required to manage and maintain the habitats. While we agree strongly with the statement that ‘*cycling is also a common form of transport used to get to Newbold Comyn which provides a greener alternative to driving*’ this is at odds with the promotion of driving as a means to access Newbold Comyn and a substantial increase in the number car parking spaces through the construction of a new car park on green space [see further comments under Access].

Activities

No evidence has been provided that ‘*high platforms, climbing walls, ropes and zip wires*’ are viable or desired by residents/visitors, and there is no reference to the methods which would be used to ensure that the design and construction of any such facilities would not compromise other priorities such as biodiversity enhancements. The need for areas currently open to public access to be given exclusively over to ‘*high platforms, climbing walls, ropes and zip wires*’ and fenced off for private commercial use is not mentioned and should be explicit.

Nature Reserve

The consultation materials do not include previous suggestions made by WWT that the habitat creation is phased over a period of approximately 30 years in five tranches. Presumably this is still part of the underlying thinking given the Habitat Creation Phasing Plan diagram in the map legend but as presented this is not explained to people responding to the consultation.

We very much welcome the statement that ‘*the proposals include creating new natural habitats on the former golf course which, subject to further detailed scientific surveys, might include wildflower glades, species rich meadows, wet scrapes and ponds, planting of native trees and dry habitats such as heathland*’ especially the requirement for ‘*further detailed scientific surveys*’ which we interpret to be a reference to our previous emphasis on the importance of a proper and full Habitat Creation Feasibility Study. **The need for a proper and full Habitat Creation Feasibility Study remains our main comment on the nature reserve.**

Contrary to the website the interactive map does not allow users to ‘*see the nature reserve extension*’. The map does not show where the boundaries of the existing nature reserve lie and where the boundaries of the new extended nature reserve are proposed to sit, so that people can see and respond to the ‘*extension*’.

Visitor Centre/Café

WWT has previously expressed an opinion that a new Visitor Centre would be essential at Newbold Comyn and we therefore welcome the inclusion of a Visitor Centre in the draft masterplan. However

**WWT is very concerned at the location of the proposed new visitor centre**. We have previously commented that any new Visitor Centre will need to deliver multiple functions including:

1. servicing the football pitches
2. providing leisure facilities such as toilets and café
3. enhancing the visitor experience of bringing nature back and why this is necessary
4. explaining what is happening at Newbold Comyn
5. generating support for the long term management of the new extended nature reserve
6. providing ways for people to get directly and indirectly involved

The location proposed in the draft masterplan has the new Visitor Centre surrounded by car parks and football pitches and isolated from the area where the habitat creation will be taking place to extend the nature reserve. It needs to be more central to Newbold Comyn in a location which optimises the delivery of all six functions. A Visitor Centre in the proposed location would struggle to create ‘*creating a place for visitors which enhances their experience of Newbold Comyn with can promote engagement with the nature reserve*’. **A small adjustment to the location could avoid this risk.**

Access

WWT is concerned and, without much more detailed information, would not support increasing the provision of car parking at Newbold Comyn by 59% (from 333 to 530 places). Conversion of nearly a hectare of green space into a car park and encouraging visitors to drive to Newbold Comyn instead of using more sustainable, low carbon, transport is not compatible with:

* Warwickshire District Council’s stated response to the Climate Emergency they have declared which includes ‘*facilitating decarbonisation by local businesses, organisations and residents, in order for Warwick District to be as close to zero by 2030 as possible*’ <https://www.warwickdc.gov.uk/info/20468/sustainability_and_climate_change/1437/climate_emergency_declaration>
* Plans to establish a ring-fenced Climate Action Fund which would (amongst other things) provide sustainable transport – reducing congestion and air pollution <http://wdcan.co.uk/>
* The statement made earlier in this consultation that ‘*cycling is also a common form of transport used to get to Newbold Comyn which provides a greener alternative to driving*’

The space earmarked for extra car parking and the facilities of a new Visitor Centre at the heart of the whole site would be better used for the promotion of public transport, electric vehicles, cycling and walking to access Newbold Comyn, to reduce the total number of motorised journeys. We have already noted that the assumptions behind the commercial viability of the proposed golf and adventure activities offers have not been made public. **If the viability of these offers are dependent on levels of visitors which are only feasible if car parking is increased by 59% then we would consider them to be unviable in terms of carbon emissions and climate change.**