

Tel: (0191) 284 6884
Fax: (0191) 284 6794
Email: mail@northwt.org.uk
Web: www.nwt.org.uk

Northumberland Wildlife Trust

People taking action for wildlife



FAO the Inspector,

Site at Highthorn, Widdrington, Northumberland, Planning Inspectorate Ref:
APP/P2935/V16/3158266 Open Cast Public Inquiry

Updated position on the proposed development from Northumberland Wildlife Trust, 19th June 2017

Following the further submission of material and clarifications and discussion with the applicant, HJ Banks and Company Ltd, and Northumberland County Council, and in collaboration with our partners The Royal Society For the Protection of Birds, Northumberland Wildlife Trust has reviewed its position on the development proposal in several areas and we are keen for this to be noted by the Inspector ahead of the planned session on conditions and obligations on 20 June 2017.

- With regard to our overall position NWT remains opposed and **maintains its objection** for previously stated reasons linked to **coal extraction and climate change**. We strongly believe that this is the wrong time to be extracting coal when the Government has stated it aims to reduce CO² emissions from fossil fuels, especially coal, in the next few years and phase out coal production for this reason. As the work of FOE and RSPB illustrates, the amount of carbon produced from this development alone would be impactful and add to the difficulty nationally of reducing our greenhouse gas emissions and meeting climate change targets by 2020.
 - In addition, whilst we are encouraged by the movement towards our position on deliverability offered by the updated S106 and S39 agreements, we remain, as does our partner the RSPB, very concerned with regard to the financial security offered for restoration.
 - We also remain concerned about the impact of the development in this area so enjoyed by those who visit in increasing numbers to watch wildlife and experience nature. Indeed we are just this week about to open a new Wildlife Discovery Centre at Hauxley on Druridge Bay, some seven miles north of the Highthorn site and we are concerned this could impact on visitor numbers and compromise our members and other people's experience of what is largely seen as a rural setting, rich in wildlife.
1. However, the recent efforts to address the other concerns on which we objected have been addressed positively and in a constructive and creative manner by the applicant, though a S39 redrafted document was received very late indeed in the process, making detailed scrutiny difficult; and we believe further drafts will be submitted before the Inquiry closes that we will not see or have time to comment on. This should have been received and discussed before the Inquiry.

2. The specific comments we and RSPB made in relation to pink footed geese movement and in relation to maintaining habitat as part of Restoration First have been satisfied. This revisiting and remodelling of the timing of backfilling and the addition of the use of sacrificial crops should provide good mitigation for this species. A mitigation plan to address patterns of cropping and phasing of extraction however will be required.
3. Likewise we are satisfied that marsh harrier overflying the site will not be a major concern and the detailed prescriptions for waders contained in the habitat mitigations suggested by the RSPB, to be addressed under Restoration First should be fully adopted and implemented and this is reflected in the redrafted S39 agreement.
4. We are satisfied that the hydrological issues relating to Cresswell Pond SSSI have been researched and analysed adequately and whilst there may remain a marginal risk, there is no further work that can be carried out on this. However, we ask that as part of the planning conditions, this is constantly monitored and action is taken if obvious effects on levels and water condition are observed at any point during the development, should it proceed.
5. We are particularly encouraged by the details now available of the S106 and S39 agreements which detail how the habitat creation and mitigation will be enacted. The signing up of landowners to the S106 agreement and the additional fund for wider ecological network development is welcomed and we are satisfied that this makes delivery of the mitigation in the short to medium term more likely as described and intended. The 25 year maintenance and development of habitat, though welcome, will not be sufficient in the long term to ensure these habitats and restored land for wildlife is beneficial and that is why we feel strongly that the planning conditions should require the close involvement of conservation organisations such as ours in the management and oversight of the land from the start and into the long term. We would like to see the Management Advisory Group be able to recommend adjustments to the annual monitoring as part of the 5 year management plan reviews to allow for appropriate changes in monitoring phasing and type.
6. There are two areas of clarification still needed at this stage. One is the period of ecological monitoring over the 25 years, in 5 years management plan periods. It is not clearly stated if annual monitoring will be undertaken every year over the 25, or be confined to only the first 5 years. It is essential a 25 year annual monitoring programme is set up.
7. In terms of the habitat restoration scheme, there still needs to be an appropriate mechanism for ensuring the detailed design plans for each S39 Restoration First area are submitted to and approved by the Council with enough time for sufficient scrutiny and well before any commencement date. This is particularly important as Hemscott Ponds and Druridge Ponds are to be delivered prior to commencement. Timescales appear very tight indeed for the Habitat Creation Scheme which will be submitted to the Council for agreement and this could require planning consent. The requirement to have the Habitat Creation Scheme submitted for approval within 8 weeks prior to commencement makes timescales unrealistic and we suggest a period of 6 months. It also appears that the management plan is also mistimed and will arise too late in the overall scheme for the same reasons cited above.
8. As for Druridge Pools West shelter belt, we are concerned that suggested removal of the shelter belt here with its heronry is not acceptable. Whilst it compromises the wet grassland creation here, this needs to be addressed specifically in the Habitat Creation Scheme.

Finally we support RSPB's detailed comments in relation to the financial security for the restoration as detailed in S106 v21 as mentioned above. Any doubt over the financial viability that may guarantee the restoration of this site, should it be consented, is a serious concern. It has been the case previously on Druridge Bay, with different applicants, that insufficient funding for restoration was available and the habitat restoration and mitigation promised was not completed with little, if any, biodiversity gain. This must be avoided at all costs in respect of the extent of impingement and impact on the local environment this application represents. We ask for this element to be specifically taken into account by the Inspector.

Mike Pratt

Chief Executive

Northumberland Wildlife Trust



Garden House, St Nicholas Park, Gosforth, Newcastle upon Tyne NE3 3XT

Chief Executive Mike Pratt Patrons Bill Oddie, Chris Packham, Conrad Dickinson, James Joicey
Registered Charity No. 221819 Registered Company No. 717813 Registered in England & Wales VAT No. 556 103265

