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Planning Manager
North Tyneside Council
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12/9/17

Dear Jackie,

Planning consultation: 17/01145/LBC and 17/01146/FUL - Refurbishment of lighthouse, demolition and extensions to visitor centre, and renewal of causeway at St Mary's Island

Please accept our response on the submitted proposals for St Mary's.

Northumberland Wildlife Trust do manage land within walking distance of St Mary's (our reserve at Holywell Pond) and highly value NTC's important people engagement and wildlife conservation work at St Mary's which is amongst the region's most important marine and coastal wildlife learning destinations. Vital to this is St Mary's setting amongst a network of designated terrestrial, coastal and marine sites, as is reflected in the submitted planning documentation. The proposals submitted could potentially enhance the connection between visitors and nature whilst restoring and protecting significant built heritage. However, as submitted, the proposals cause Northumberland Wildlife Trust a number of concerns regarding potential significant impacts on the species and habitats associated with these designated sites of nature conservation importance.

Our concerns echo those expressed by Natural England in their response dated 4th September 2017 and expressed verbally during pre-consultation by other stakeholders including St Mary's Seal Group.

In particular:

- 1) The documents presented omit details of operational phase visitor management plans that might give us confidence in the adequacy in the description of proposed mitigation associated with:
 - Disturbance/displacement/abandonment of the site/harm to wintering birds (SPA/SSSI bird species) as result of increased footfall.
 - Disturbance/displacement/abandonment of the site/harm to wintering birds (SPA/SSSI bird species) as result of viewing platforms.
 - Disturbance of grey seals during the operational phase as result of increased footfall
 - Disturbance of grey seals during the operational phase as a result of viewing platforms.

The potentially impacts of visitor behaviour on wintering birds and seals is acknowledged in the Environmental Statement (p 206-7) and yet no details are given of the proposed mitigation.

The lack of any detailed proposals for visitor management and interpretation, either within the built environment of St Mary's or wider immediate habitats, leaves us unable to make any assessment about potential recreational impacts as we cannot see how the applicants assessment of the efficacy of mitigation impacts has been reached.

- 2) The Environmental Statement does not identify intertidal underboulder communities (a designated habitat feature of the Coquet to St Mary's Marine Conservation Zone) as sensitive to the operational impacts of this proposal. This habitat type appears to the present along St Mary's promenade (according to [MCZ mapping](#)) and may be particularly vulnerable to increases in recreational use of the shore associated with this proposal. Mitigation (potentially through interpretation and monitoring) should be considered.
- 3) The Environmental Statement does not acknowledge the likely effect of increased site use in generating additional public source waste, including plastics and fishing gear, that may impact on the designated habitats and species associated with intertidal areas. Mitigation (potentially through monitoring and clean-up tasks) should be considered.

We hope NTC can provide the additional details highlighted above, especially proposed mitigation. Without such information, Northumberland Wildlife Trust will be minded to object to this proposal.

Yours sincerely,



Nick Mason
Director of Living Landscapes