



Dewley Hill Surface Mine – July 2020

Further to objections in April 2019 and January 2020, Northumberland Wildlife Trust (NWT) submitted an additional objection in response to the second addendum to the Environmental Statement made by Banks Group.

Ecological Impacts

We welcome the additional measures put in place to address some earlier concerns, particularly regarding the impacts to the Dewley Burn, the Ouse Burn and Callerton Ponds LWS. However, our original objections still stand. The mitigation for the loss of habitat to a number of farmland bird species, e.g. skylark, lapwing and yellowhammer, even with the inclusion of the bow-tie fields, does not go far enough. Temporary loss of habitat such as during the active phase of the mine can contribute to population declines or even local extinctions, which can prevent these species from recolonising naturally post-restoration. These potentially devastating short-term impacts should not be ignored, particularly given the potential for Banks Group, as they have done elsewhere, to ask for the length of the operational phase of the mine to be extended in the future.

The Trust recognises that the Banks Group intends to limit the loss of mature hedgerows and trees and maintain a level of connectivity through the site by translocating some of these features. However, NWT finds this cause for concern. Translocation is not without risks, and these features may be damaged beyond repair during the process. The applicants are keen to stress the success of using translocation for veteran trees at their Brenkley mine, however it is apparent that some of these trees experienced root damage during the move and have had to be pruned back heavily as the remaining roots can no longer support the full scale of the crown. This has seriously reduced their value for wildlife in the short and medium term.

The recently adopted Newcastle City Council Development and Action Plan states that developments with adverse impact to green infrastructure must demonstrate benefits that outweigh the harm. The National Planning Policy Framework states that planning permission for coal extraction should only be granted where the proposal is environmentally acceptable or provides national, local or community benefits that clearly outweigh likely impacts.

As detailed above, we feel that the proposed development will have an adverse impact on the environment and wildlife within and is therefore not environmentally acceptable. NWT does not feel that Banks Group has adequately demonstrated benefits from the development for the following reasons:

- The applicant states that the extraction of fireclay will benefit the local economy by providing materials for the brickworks at Throckley. However, the DAP identifies that the brickworks already has a supply of materials from elsewhere.
- Although the applicant has argued that this development will lead to the creation of jobs, the Government has just announced a major green investment package that could support 140,000 jobs and reduce the reliance of British homes on high-carbon energy, as well as a Venture Capital Fund to support



green start-up companies. Both of these funds will negate the need for reliance on the coal industry and create job opportunities well over and above what Banks can offer.

- Government figures indicate that coal power stations have already stockpiled more than twice the estimated amount of coal needed until the UK ends coal-generated power in 2025. In addition, the National Power Grid has just had a run of 67 coal-free days. This was interrupted only because a power station needed to be brought online to carry out maintenance, not because of power demand. The station was disconnected less than 24 hours later. This demonstrates that the demand for coal is diminishing, and that there is no need to continue with the harmful practice of extraction.

Given that the benefits of this development do not outweigh both the immediate ecological harm caused by the creation of this mine, or the longer-term impacts that will be felt by our wildlife in response to the climate change that coal extraction and use contributes to, planning should be refused in accordance with the National Planning Policy Framework and local Development and Action Plan.

Contribution to Climate Change

The Newcastle City Council Development and Action Plan states that although Dewley Hill is designated as an Area of Search for mineral extraction, the acceptability of working the area must be assessed in line with National and Local Plan policy.

The Core Strategy and Urban Core Plan, part of the Local Plan, states that development is required to minimise contributions and provide resilience to climate change, reduce CO₂ equivalent emissions impact, and optimise the use of local renewable or low carbon energy. The National Planning Policy Framework states that planning systems should support the transition to a low carbon future in a changing climate, help to contribute to radical reductions in greenhouse gas emissions, and support renewable and low carbon energy and associated infrastructure.

This development by its very nature, cannot minimise contributions to the impact of climate change, reduce its whole-life CO₂ equivalent emissions impact, optimise the use of local renewable or low-carbon energy, or support the transition to a low-carbon future, since it supports our continued reliance on high-carbon energy sources. Therefore, given that this development does not meet the requirements of the National or Local Plan policies, planning permission should be refused.

NCC has declared a climate emergency and has achieved over a 40% reduction in their CO₂ emissions in the last decade. If they were to approve this plan then they would be undermining their own efforts, as well as those of the community, to reduce emissions and fight climate change. A precedent has been set by Durham County Council; whose planning committee recently rejected an application to expand the Banks Group's Bradley West mine based on environmental concerns. NWT encourages NCC to follow in Durham's footsteps, and refuse planning.