







Northumberland County Council

City Hall Morpeth **NE61 2EF**

10/01/2023

22/04582/OUT | Outline permission (all matters reserved) for new country park lodges, visitor centre, wood meadow and play area | Land North East Of Honeysuckle Cottage Widdrington Northumberland

Dear Planning Officer,

Please find comments below, further to our response of 3rd January 2023.

Northumberland Wildlife Trust (NWT) is concerned about the cumulative impacts of the above planning application, approved plan 17/04330/FUL, and application 22/04609/REM. In fact, if all these plans go ahead, the wider area (including Seddon's Caravan Park) will go from the current level of <100 holiday pitches to >1,100, an increase of over 1000%.

NWT has a number of nature reserves & wilding sites in the area, with the closest sites being Wilding West Chevington (260m north), and Stobswood (300m south) (not directly adjacent, as incorrectly stated in our last letter of 03/01/2023). The Trust is concerned about the impacts of an increase in recreational pressure on our sites, primarily those closest to the development. In particular, we are concerned about the impacts and disturbance to wildlife and habitats that result from increased dog-walking, such as nutrient enrichment from dog fouling.

The Ecological Impact Assessment (Nov. 2022) states that the nearest records of Section 41 (NERC Act 2006) invertebrates are from a site 2km away. However, Butterfly Conservation has records¹ of small pearl-bordered fritillary (Boloria selene) at Colliersdean Plantation in 2020, which falls within 500m of the development red-line boundary. NWT also holds records for dingy skipper (*Erynnis tages*) approximately 800m from the development red-line boundary (2022), and wall (Lasiommata megera) approximately 1km from the development red-line boundary (2022), both on our Wilding West Chevington site. The Trust appreciates that these records may not yet have filtered through to the local environmental records centre. Given the presence of a number of S41 Butterfly Species within 1km of the development site, we would ask that butterfly surveys please be carried out at an appropriate time of year to assess whether or not these species are present on site.

¹ S. Austin & R. Norman, *Butterfly Summary 2020*. Butterfly Conservation, North East England Branch. 2021. http://www.northeast-butterflies.org.uk/download files/Annual%20Butterfly%20Report%20%202020.pdf [accessed] 10/01/2023].





Whilst Biodiversity Net Gain is not yet mandatory, the Northumberland Local Plan, and National Planning Policy Framework (NPPF) both state its importance. Policy ENV 2 of the Northumberland Local Plan states that development plans will "secure a net gain for biodiversity". Section 174(d) of the NPPF states that planning decisions should be "providing net gains for biodiversity". As a result, many developers are already integrating it in their approach. NWT is therefore disappointed to see that a biodiversity metric assessment has not been undertaken for this development, and would welcome the applicant doing so.

Detail around landscaping has not been provided as part of this outline planning application. Given the siting of the development in close proximity to large nature areas, we would consider it appropriate that any landscaping plans should focus on native planting that is complimentary to the surrounding habitats. The Ecological Impact Assessment (Nov. 2022) identifies that certain areas of habitat will be created, and that hedgerows will be improved/created. However, without a detailed landscaping plan we cannot accurately assess the impacts of these proposals. Drainage also has not been addressed, but we would like to see some thought given to this in the future as part of the landscape plans for the site. The surface run-off from the land in this area is already causing issues downstream, with the Steads Burn experiencing incising erosion, and reedbeds on the Chevington Burn becoming silted. It would therefore be of benefit to consider the introduction of SUDs basins etc. into the landscape plan in order to hold water on site, and consider how to slow the flow of water off-site using landscaping to address these issues.

Given the above concerns, NWT is **objecting** to this plan in its current form. If more information is made available, the Trust would appreciate further opportunity to comment. If there are any questions regarding our response, please do not hesitate to get in touch.

Kind regards,

Alice McCourt

Conservation Officer

Northumberland Wildlife Trust



