



Former Beal Station, Lindisfarne

Planning Statement

October 2022

Project	RD2029
Client	Natural England
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Appendix 01: Northumberland Local Plan 2016-2036 (March 2022)

Introduction

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Introduction

Introduction

- 1.1. This Planning Statement is submitted on behalf of the Applicant, Natural England, in support of a full planning application to Northumberland County Council for the erection of a single-storey building at the Former Beal Station, Berwick-Upon-Tweed, Northumberland TD15 2PB.
- 1.2. The Description of development is,
"The erection of a single store building comprising a laboratory and workspace, ancillary accommodation including dormitories, w/cs and kitchen and associated works."
- 1.3. The proposed building is intended to support the existing function of the site. The existing site is a reserve base serving the National Nature Reserve (NNR). It currently comprises a single storey building that functions as multifunctional space used as an office and workshop and vehicle storage.
- 1.4. The application is submitted alongside the following plans and drawings:
 - Site Location Plan (ref. 7185-LP_A)
 - Existing Site Layout Plan (ref. 7185-02_A)
 - Proposed Site Layout Plan including Levels (ref. 7185-03_A)
 - Proposed Elevations (ref. 7185-05)
 - Proposed Floor Plan and Roof Plan (ref. 7185-04)
 - Photo montages;
- 1.5. The planning application is also accompanied by:
 - Preliminary Ecological Appraisal dated November 2021;
 - Flood Risk Assessment (ref. 4-8130 Rev 02);
 - Drainage Strategy (ref. 4-8130 Rev 02);
 - Highways Technical Note (ref. 220930/SK22279/TN01(-01));
 - Noise and Vibration Assessment (ref. P22-329-R02v1);
 - Initial Site Investigations Report (ref. 3812-01);
 - Nutrient Budget; and,
 - Tree Survey and Impact Assessment dated August 2022.
- 1.6. This statement provides a summary of the site, assessment of the proposal against associated planning policy, relevant opportunities and constraints, and confirms that the proposed development meets policy requirements.

Site Context

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Site Context

Natural England

- 2.1 The applicant, Natural England, is the Government's advisor for the natural environment in England. Established under the Natural Environment and Rural Communities Act 2006, the body is designed to manage, conserve, and enhance the natural environment for the benefit of both current and future generations.
- 2.2 Natural England have a number of priorities for the 2020-2025 period that are in line with both their vision of a "Thriving Nature for people and planet", as well as the Government's 25 Environment Plan. These are as follows:
- A well-managed Nature Recovery Network across land, water and sea, which creates and protects resilient ecosystems rich in wildlife and natural beauty, enjoyed by people and widely benefiting society;
 - People connected to the natural environment for their own and society's wellbeing, enjoyment and prosperity;
 - Nature-based solutions contributing fully to tackling the climate change challenge and wider environmental hazards and threats;
 - Improvements in the natural capital that drives sustainable economic growth, healthy food systems and prospering communities;
- Evidence and expertise being used by a broad range of partnerships, organisations and communities to achieve Nature recovery and enable effective regulation and accreditation being a values-led organisation that delivers excellent service standards to all partners, organisations and communities engaged in achieving Nature's recovery
- 2.3 The proposed development is intended to support Natural England's existing facilities, so that they might further work towards these established priorities. The existing facility operates within the Lindisfarne & Newham Bog NNR which holds many nationally important habitats.
- 2.4 Natural England has a successful relationship with Newcastle University and this facility will enable it to further strengthen research links with them, and to other independent / private sector organisations, as well as providing opportunities to individuals, all to support the ongoing environmental research challenges.
- 2.5 The proposed development has been designed to provide new facilities which will support the day to day management responsibilities, and to support visitors and volunteers engaged in research based project.
- 2.6 The proposed development is one which forms part of a larger ambition of Natural England which will help them address the nationally recognised need to improve the sustainable management of the environment and natural resources.

Site & Surroundings

Site & Surroundings

- 3.1 The application site (0.1Ha) was the former Beal Station yard and is located within the jurisdiction of Northumberland County Council.
- 3.2 It is on Lindisfarne Causeway Road which leads east towards Holy Island, circa 6.5km to the East. The site is relatively flat, with access from the north side via a private access.
- 3.3 The site is used by Natural England as a reserve base. It comprises a central building in use as office, workshop and vehicle storage. Externally there is an expanse of hardstanding that is used as an area for vehicle, machinery and general storage. There are some trees and vegetation along the western boundary of the site both within and beyond the site boundary.
- 3.4 The application site has no specific land-use allocation as defined by the Northumberland Local Plan Proposals Map. The site sits within a 'Water Resource Zone' and 'Mineral Safeguarding Area'.
- 3.5 The site is bounded by a line of mature and semi-mature trees, hedgerow and scrub along the western edge of the site. There is also a small brook that flows north along this edge (outside the site boundary).
- 3.6 The majority of the site is located within Flood Zone 1. The north-western portion of the site is within Flood Zone 2 which indicates the potential for some localised flood risk.



The site itself does not sit within the boundary of a protected environmental or landscape character area. However, the site does lie in relative proximity to Lindisfarne and Holy Island which are surrounded by the Northumberland Dunes and associated wetlands. This is statutory protected land that sits roughly 1.3km east of the site and is covered by the following designations:

- Lindisfarne, National Nature Reserve
- North Northumberland Dunes, Special Area of Conservation
- Berwickshire & North Northumberland Coast, Special Area of Conservation
- Lindisfarne, Site of Special Scientific Interest
- Lindisfarne Ramsar Convention Wetlands
- North Northumberland Coast, Area of Outstanding Natural Beauty, which lies approximately 20m east of the site.

- 3.7 The site's eastern edge is bounded by the East Coast Railway Line, beyond which lies Holy Island and the Lindisfarne & Newham Bog National Nature Reserve (NNR). The purpose of Natural England's current operations from the site are to manage and maintain this NNR.
- 3.8 The site is not within a conservation area nor within the immediate vicinity of a listed building or non-designated heritage asset. The nearest listed buildings are separated from the site by the railway line and are c.250m east of the application site. These comprise Beal House, Farm Buildings, Cart House and Dovecote which are all Grade II listed.
- 3.9 Approximately 14m to the northern edge of the application site is a dwellinghouse which is separated from the application site by a timber fence. This dwelling is access via the same private access as the application site.

Accessibility and Sustainability

- 3.10 Vehicular and pedestrian access to the site is roughly 35m to the north, via a private drive accessed off Lindisfarne Causeway Road. The road network provides direct access to the A1 which provides a connection to the north and south to larger settlements such as Belford, Bamburgh and Tweedmouth.
- 3.11 The nearest bus stops are c57m to the north along Lindisfarne Causeway Road. These connect to other services, and together provide a (northbound, southbound, westbound) service to Holy Island, Belford, and Berwick-upon Tweed. All bus stops are accessible by foot, via a public footway which extends the length of Lindisfarne Causeway Road.
- 3.12 Public services and amenities are available on Holy Island. These include restaurants, bars, St. Aidan's Catholic Church, Little Tree public library and Holy Island Fire Station. Holy Island is approximately 6.45km (10-minute drive) east from the site and is accessible via Lindisfarne Causeway.



Planning History

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Planning History

Planning History

- 4.1 The site has been subject to several full planning applications. Those which are available to view publicly via the Council's online planning register are as follows;
- 13/00280/FUL for the Erection of a workshop, granted permission April 2013;
 - N/87/B/183 for the Erection of a storage building for vehicles, equipment and fencing materials, granted permission September 1987.
 - N/83/B/0276/P for the Erection of a storage building, granted permission January 1984; and
 - N/78/B/185 for the construction of a road bridge to replace an existing level crossing, granted permission July 1978.



Proposed Development

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Proposed Development

Proposed Development

- 5.1 Natural England's essential requirement for the proposed building is set out in Section 2.0 of this report.
- 5.2 The proposed development comprises the erection of a single storey building which includes a laboratory with ancillary accommodation and associated facilities. These include a kitchen, two dormitories and accessible toilet facilities. There is also a raised covered platform on the east elevation.
- 5.3 These are shown by the submitted drawing pack and are visualised by the selection of montages prepared by the architect which are all submitted with this application.

Design and Layout

- 5.4 The proposed design has been developed to ensure a positive contribution to the immediate character and built form of the area. Principally, the building mass and footprint of the proposed building are designed to be both in keeping with the existing workshop building but also fit within the space available to create one linear extend of built form along the western edge of the site. The buildings would be clustered and concentrated along the western edge keeping the site open along the railway and closest to the NNR.
- 5.5 The proposed building mirrors the existing building in height and vertical plane across the front facing façade, as shown in the architectural montages.



- 5.6 Proposed materials have been carefully selected to assimilate with the existing reserve base, while providing a more modern and bespoke architectural character to enhance the attractiveness of the complex as a whole. The roof will be flat to match both the existing building but also to facilitate a green roof. The main building materials will be timber cladding and green render.
- 5.7 The proposed development would also be entirely DDA compliant with level and ramped access externally and accessible facilities internally.

Access and Parking

- 5.8 The existing access to the site is to be maintained via the private access from Lindisfarne Causeway Road. Existing car parking will largely remain unaltered. The proposed site plan and supporting Transport Note demonstrate the number of spaces available on site as part of the proposed development. There will be 7 no. spaces including space for an accessible space and two EV charging points. Natural England also intend to make provision for secure cycle storage on site.



Planning Policy Context

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Planning Policy Context

Planning Policy Context

- 6.1 In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004, the application must be determined in accordance with the adopted development plan unless material considerations indicate otherwise.
- 6.2 The development plan comprises the Northumberland Local Plan 2016-2036 ('Local Plan'), adopted March 2022.
- 6.3 There is no site-specific land use allocation within the development plan policies map. However, the site does sit within to a 'Water Resource Zone' and 'Mineral Safeguarding Area', as well as the wider 'Strategic Delivery Area'.
- 6.4 Local Plan policies that are relevant to the proposed development include:
- STP4 Climate Change Mitigation and Adaptation
 - ECN12 A Strategy for Rural Economic Growth
 - ECN13 Meeting Rural Employment Needs
 - ECN14 Farm / Rural Diversification
 - QOP1 Design Principles
 - QOP2 Good Design and Amenity
 - QOP5 Sustainable Design and Construction
 - ICT2 New Developments

- ENV2 Biodiversity and Geodiversity
- ENV3 Landscape
- ENV5 Northumberland Coast Area of Outstanding Natural Beauty
- WAT2 Water Supply and Sewerage
- MIN4 Safeguarding Mineral Resources

6.5 A summary of these policies is included within Appendix 1 of this document.

Material Considerations

6.6 Material Considerations include the National Planning Policy Framework (NPPF), Planning Policy Guidance (PPG), National Design Guide (2019) and the Northumberland Coast AONB Management Plan 2020-2024.

Pre-Application Advice

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Pre-Application Advice

Pre-Application Advice

- 7.1 Chapter 4.1 of the National Planning Policy Framework (The Framework) encourages applicants to engage in pre-application discussions with the Local Planning Authority to determine potential key opportunities and challenges at an early stage.
- 7.2 The Applicant requested pre-application in November 2021. This sought the Local Planning Authorities views on the proposals and particularly the principle of development, as well as the design of the proposed building.
- 7.3 The submission included a written statement prepared by Eden Planning, as well as several indicative hand drawn architectural drawings. A written response from Council Officers was received in February 2022 was supportive of the principle of the proposal and we summarise the comment received in this section.
- 7.4 The design has developed since this submission but remains comparable in terms of siting, scale, massing and materials.

Case Officer Response

- 7.5 The key planning issues to consider within the assessment of the proposed development were; Principle of development, Design, Ecology, Parking and Highways, Water Management.
- 7.6 The Principle of development was found to be acceptable under the then emerging Northumberland Local Plan, which includes policies aimed at promoting sustainable development and the growth of existing rural operations.
- 7.7 With regard to the principle of the proposed development the officer states:
“The site lies within the open countryside which does not normally attract a positive policy position under F1 of the Berwick Local Plan. However, given the proposal would serve an existing established use and complement the existing structures on the site then the principle of development can be accepted.”
- 7.8 The response also recognised that the design will be utilitarian with a focus on function. Given the design is consistent with the functionality of the existing use it is considered acceptable. The officer queries whether the site was the most sustainable and we provide comments in Section 7 of this report on why the siting is both appropriate and sustainable.
- 7.9 As part of the pre-app the County Ecologist provided a written response which is detailed in this section.

- 7.10 It was proposed that an application ensures adequate visibility splays are maintained which allow access for the relevant type of vehicles that will use the site. Minimum parking requirement was taken as 1 space per 50sqm of floor area (for use class B2). A Transport Note has been submitted with this application and demonstrates why the level of parking is appropriate with regard to the Council's parking standards.
- 7.11 It was considered that the site could be at risk of some limited localised flooding, and that any development should evidence appropriate surface water management. A Flood Risk Assessment and Sustainable Drainage Strategy has been prepared to accompany the planning application.

Ecology Response

- 7.12 A written response was received from the County Ecologist, which provided comments on the potential ecological value of the site, and the likely effects development would have.
- 7.13 While the site does not sit within an environmental designation itself, the ecologist did note that the site does lie within the Impact Risk Zone of the Lindisfarne SSSI and site only 40m to woodland Habitat of Principal Importance (HPI) where a number of important species have been recorded.
- 7.14 Several surveys were recommended including bat and bird surveys of nearby buildings and trees. It was also advised that mitigation for the likely impacts on potentially sensitive habitats be fully evidenced in an appropriate plan in the event of a full planning application.

- 7.15 To mitigate potential impacts of increased recreational disturbance on bird species that are interest features of the Coastal SSSIs and protected landscape sites, a proposed fee was recommended via S.106 agreement.
- 7.16 The need to safely dispose to waste and sewage for development in sensitive areas such as this, that are not connected to mains sewers was also raised. This is to avoid excessive nitrate levels and has since been reinforced by Natural England's own guidance on the matter, as well as the updated national legislation on nutrient neutrality. A nutrient budget and mitigation strategy has been prepared and accompanies this application.
- 7.17 It was also noted that climate change would be an important factor to account for, given the amendments to The Frameworks and the emerging Governments 25-year Environment Plan. "It will, therefore, be necessary to show that the effects of climate change have been considered, through the inclusion of appropriate habitat(s) for mobile species."

Summary

- 7.18 The overall conclusions of the pre application feedback was supportive.
- The principle of the development would be acceptable.
 - The proposals were considered to be in general accordance with the development plan.
 - A planning application would be likely to be looked upon favourably.
- 7.19 This planning application reflects the proposals submitted as part of this pre-application engagement. Where technical input has been requested this has been provided in support of this application. We have also provided further information in relation to the justification for the proposed development to be on this specific site.

Planning Assessment

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Planning Assessment

Principle of Development

- 8.1 The site lies within the open countryside and is not allocated for any specific land use within Northumberland County Council's Development Plan.
- 8.2 The wider site is currently operated by Natural England and is occupied by an existing workshop and vehicle storage building and hardstanding that is used for storage of vehicles and other materials. The proposed development would be entirely within the curtilage of the existing reserve based. It would enable the expansion to the existing reserve bases function which is entirely associated with the existing activity on site.
- 8.3 Th site benefits from being contained within a small, built compound and has an established planning history. The proposal would serve an existing established use, to support and complement the existing structures on the site.
- 8.4 Strategic Policy ECN 13 'Meeting rural employment needs' of the NLP seeks to support the growth of existing operations in rural areas to ensure the continued provision of jobs. This is provided that development in rural areas does not impact negatively on agricultural uses and is located within or in close proximity to existing development.

- 8.5 Of specific relevance to the proposed development Part 2, b. of Policy ENC 13 states particular support will be given to:
"The further diversification and development of educational facilities where these will help to further enhance Northumberland's rural economy and training opportunities for rural professions, particularly those in relation to the County's further and higher education offer"...
and
"Proportionate well related development, necessary for the continued operation in situ of an existing rural business."
- 8.6 The proposed development offers an extension to an already existing research base (Lindisfarne & Newham Bog NNR), to expand the capabilities of the facility and promote further use of the site by Newcastle University in cooperation with Natural England. It is anticipated that the proposed development will retain the 3 full time Natural England job roles, enable the appointment of additional volunteers and support the training and education of visitors including from educational establishments such as Newcastle University. The proposed development will not give rise to a loss of agricultural uses, and instead the proposed use is wholly aligned with the Council's strategic objective as outlined within Policy ECN 13.
- 8.7 Overall, the principle of development was considered satisfactory during pre-application; *"The principle of the development is acceptable under the emerging NLP"*.

- 8.8 In addition to the NLP the NPPF also supports new development in rural areas that is responding to local business or community needs. Paragraphs 84 and 85 are of particular relevance.
- 8.9 With regard to paragraph 84 of the NPPF, Natural England are a “land-based” organisation with a focus on enabling education, research and recreation under the wider objective of conservation of the NNR. The site is close to the NNR and will support this existing function whilst also meeting an identified need for improved facilities. The proposals are designed in a way that respects the character of the site but ultimately strives to benefit the area. The development accords entirely with the NPPF in this regard.
- 8.10 The proposed development would enable the continued management of the NNR by Natural England. This would provide a well design reserve base essential to supporting Natural England in its ongoing duties and delivery of the ambitions set out within the Government 25 year Environment Plan. The NPPF at paragraph 85 recognises that in some cases sites may need to be located beyond settlement boundaries as is the case here. As such the proposal is considered in accordance with the NPPF.
- 8.11 For these reasons and with reference to received pre-application advice, it is considered that the principle of development on the site is wholly acceptable.

Location of Development

- 8.12 The reserve base and wider nature reserve operate successfully due to their proximity and connectivity to the National Nature Reserve. At its closest point the NNR is approximately 14 from the site boundary. The proposed development expands on the existing function of the site and as such it is entirely necessary and appropriate for it to be located on the same site and adjacent to the existing reserved base building.
- 8.13 It is not expected that more than 10 no. visitors including staff, volunteers and students will use the site at any one time once the new building is operational. Visitors use the site as a base and vehicles will travel to and from the site to the NNR. The use of car and vehicles share for these trips is common and the highways section of this assessment considers trip generation and the appropriateness of the site to accommodate these.
- 8.14 The feedback received as part of the pre-application advice queries whether the location was the most sustainable. The site is and will continue to be primarily accessed by car and organised travel (for example, minibuses and shared travel for students) although there are bus and green travel options available. However, the low number of these journeys, the bespoke nature of the development and its purpose essential to be proximate to the nature reserve demonstrate the location is entirely appropriate and sustainable considering its use.

Design

- 8.15 The proposed building design is deliberately minimalist and functional whilst incorporating natural materials. It is intended to provide a coherent linear extension to the existing building on site. The siting, design and materials of the proposed building are intended to respond to the existing character of the site and wider setting.
- 8.16 Firth Associates are the appointed architect and have over 20 years of experience of designing buildings in rural settings. Firth is working nationally with Natural England on new reserve bases, agricultural stores and other developments to support Natural England in meeting its objectives. Firth has provided the following information in terms of the design approach for the proposed building:

"This proposal is to create a new National Nature Reserve base for Natural England on land adjacent to the existing reserve building at the former Beal station site.

This is a simple structure of masonry construction with a super insulated cavity, triple glazed windows and an intensive meadow roof. The masonry and high levels of insulation are designed to reduce the effect of noise and vibration from the railway line. The ambition is to create a good working environment and temporary overnight accommodation for visiting volunteers and students. The meadow roof aims to increase the biodiversity on the site which is predominantly hard standing. Improved car parking is also proposed alongside two electric car charging points. "

- 8.17 This design methodology aligns with the criteria established within Local Plan Strategic Policies QOP 1 'Design Principles' and QOP 2 'Good design and amenity'. Policy QOP 1 emphasises the importance for new development to contribute towards placemaking through their design where possible. As such, the following elements are highlighted:
- building heights;
 - the form, scale and massing, prevailing around the site;
 - the framework of routes and spaces connecting locally and more widely;
 - the pattern of any neighbouring or local regular plot and building widths, and where appropriate, follow existing building lines;
 - the need to provide active frontages to the public realm; and
 - distinctive local architectural styles, detailing and materials.
- 8.18 The proposed building incorporates these design elements where possible, providing a main frontage onto the covered platform, gravel courtyard and vehicle parking space along the east elevation. The building also closely reflects the scale, height and massing of the neighbouring building. The replication of key design features of this existing building promotes a development which is contextually appropriate and assimilates with the existing built form.

- 8.19 With regard to materiality, the proposed development will be constructed of masonry with a green render, timber cladding and a flat green roof. [Materials TBC].
- 8.20 Glass panels are proposed throughout the façade whilst ensuring that the building design is unobtrusive. Hard and soft landscaping is to be retained to retain the buffer between the western elevation and the neighbouring residential property to the north. These considerations comply with the measures of good design within Policy QOP2.
- 8.21 The siting of the development is not considered to have any adverse visual impact on the local landscape. The proposed building will be erected on an area comprising mainly hardstanding [TBC – conflicting comment in ecology report that this area is grassed] and will be shielded from outside of the facility by existing trees and vegetation.
- 8.22 The consistency of the design with the existing built form was considered appropriate within the preapplication response: “Given the design is consistent with the functionality of the existing use it is considered acceptable”.
- 8.23 Policy QOP5 sets out a number of sustainable design and construction measures. It states that development which promotes high levels of sustainability will be encouraged. In this case the proposed development includes the following sustainable elements:
- The building will utilise an air source heat pump;
 - The building prioritises the use of locally sourced materials;
 - Energy efficient features including low energy lighting will be used in the internal fit-out;
 - Measures to minimise flooding are incorporated including the design of a green roof; and,
 - The building is designed to be flexible to meet future and evolving needs and objectives of Natural England.
- 8.24 Overall, the design is considered in line with pertinent policies in the Development Plan and is entirely appropriate considering the site context, sustainable design and construction methods incorporated and the nature of the proposed development.

Waste

8.25 The proposed site plan indicates areas for the storage of waste. This comprises capacity for commercial bins that are used for both general waste and recycling. The existing reserve base bin store area is sufficient to accommodate additional waste created by the new building. No additional bins will be necessary and the proposed development will not prohibit the collection of bins which will continue to be emptied as per existing arrangements.

Ecology

8.26 The Northumberland Coast AONB Management Plan 2020-2024 stresses the importance of preserving natural assets such as ecosystems and scenic landscapes in and around the Northumberland coast area. Whilst the site is not within the AONB it is within the defined buffer zone of these protected areas. As such ecology and potential risks to the environment have been a key consideration in the siting of the proposal development.

8.27 Detailed comments were received regarding ecology and the environmental constraints of the site as part of the preapplication advice provided by the Local Planning Authority. The County Ecologist recommended a Phase 1 report and also as appropriate the comments suggested several additional surveys may be needed. The application is accompanied by a Phase 1 Ecology Report prepared by Ecology Consulting.

8.28 The report establishes that the proposed development poses no significant detrimental ecological effects on the site or the surrounding area, with few species identified as likely to be present on site.

8.29 The findings of the report confirm that:

- No additional ecological surveys should be required for the Project;
- No significant ecological effects of the construction of the Project are predicted, but mitigation measures will be required in order to comply with the nature conservation legislation;
- A further check for badgers should be undertaken ahead of any ground clearance to ensure compliance with the Badgers Act;
- Vegetation clearance works should be scheduled outside the main bird breeding season (March-August) in order to avoid the possibility of destroying active birds' nests;

8.30 It concludes that:

“Overall, the Project would not be predicted to have any significant ecological impacts.”

8.31 This approach to mitigation set out in the report is compliant entirely with Policy ENV 2 Biodiversity and Geodiversity which seeks to protect areas of ecological importance and ensure that new development minimises damage or disturbance to habitats and local species. The policy recommends:

“maximising opportunities to incorporate biodiversity, and ecological enhancement for species of conservation concern, through additional built-in or planted features”.

8.32 The proposed development intends to offset any potential damage caused to environmental assets or disturbance to habitats through a series of mitigation measures. The proposed design incorporates green roof and retains as many trees on site as is possible. Bird and bat boxes will be incorporated into the canopy of the proposed building. The purpose of the proposed building also has biodiversity benefits at its heart. The proposed development would support the long term management and protection of the NNR and the biodiversity value therein. The proposed development is considered entirely compliant with Policy ENV2 of the Development Plan.

Nutrient Neutrality

8.33 Advice and guidance around nutrient neutrality is available on the Council's website. It states:

“On 16 March 2022 the Government contacted Local Planning Authorities concerning a range of protected areas in England that are affected by nitrogen and phosphorus pollution, to explain that planning applications for developments likely to increase sewage discharges in the catchments of these protected areas must be accompanied by a nutrient budget showing how the level of phosphorus or nitrogen entering the protected area will change should the proposed development be implemented. It is only then possible to grant permission for the development if the nutrient budget shows that there will not be a net increase in nitrogen or phosphorus levels in the protected area as a result of the development.

The catchment of the Lindisfarne SSSI and Special Protection Area is one such catchment, due to the impact of excessive levels of nitrogen in the waters around Holy Island and in Budle Bay. This is causing the growth of extensive mats of filamentous green algae across the mudflats and sandflats in this area, preventing the wading birds for which the SSSI and SPA is designated from accessing the invertebrate food on which they depend.”

8.34 Given the site's proximity to Lindisfarne SSSI, the potential impact of nitrates is a consideration as noted during preapplication.

- 8.35 The site is located with the identified catchment. In line with the Council's guidance a nutrient budget has been completed and is submitted with this application. The nutrient budget identifies that the total annual nitrogen load to mitigate is 9.99 kg TN/year. This load has been identified using the nutrient budget calculator. At Stage 3 the 'new land use type' selected from the drop down is 'residential urban land'. The intensity of the use would not match a residential dwelling but this is the most fitting category for the proposed development given the provision of two small overnight dormitories within the building. As such it has the potential to overstate the likely nitrogen load of the proposed development.
- 8.36 Irrespective of this, in order to mitigate these potential impact of nitrates mitigation options have been explored and a mitigation strategy is submitted with this application.
- 8.37 At pre-application stage it was advised that there is "a need for the sewage package treatment plant to either discharge to ground away from the watercourse if soil conditions are suitable or to include tertiary treatment". Regard has been had to this advice in developing the mitigation strategy which is set out in the Drainage Strategy and proposes the following:
- "Foul water will be collected separately and pass into a septic tank / Package Treatment Plant (PTP) which will then be dispersed into a drainage sink. This system has been designed in accordance with Natural England's own guidance on nutrient neutrality and minimise the amount of potential contaminants from entering into soil systems. Under current proposals no connection to the public sewer is proposed."*
- 8.38 The proposed development can therefore be constructed without unacceptable harm to the water system and as such subject to the proposed mitigation should be supported.

Trees

- 8.39 There are several trees within the boundary of the site which will be affected by the proposed development. These are in addition to the trees beyond the site boundary along the western edge.
- 8.40 A tree survey prepared by Arbtech reveals the extent to which the development will need to consider its impact on trees, and the value of trees within and adjacent to the proposed development. The survey finds that a cluster of 'Class C' trees (G01) are present on the area where the proposed building will be sited. A tree group (G02) along the western edge as well as an individual Ash (T01) will also need pruning and some trees will need crownlifting to 5.5m to avoid conflict with construction traffic.
- 8.41 Policy QOP 4, Landscaping and Trees, part 2e, states that development proposals should ensure there is "no loss of existing trees which are valuable in terms of amenity, biodiversity, or the landscape". Where the loss of trees is unavoidable, as in the case of this proposal, the policy notes that the potential harm resulting from a loss of trees can be outweighed by the potential benefits of the proposed scheme. It suggests that adequate mitigation through replacement planting is possible.
- 8.42 The proposal would require the loss of a group of trees of varying dimensions and species in Group G01. The Tree survey has classed this cluster as falling within Category C which are considered trees of Low Quality of limited value. However, to comply with the guidance provided within Policy QOP4, the proposal includes the provision of green infrastructure to offset some of the potential biodiversity loss. Natural England is also committed to the enhancement of the wider reserve and as such the resulting ecological gains will outweigh the harm of the loss of these low grade trees.
- 8.43 Overall, the removal of these trees, which is necessary for the development of the site, remains coherent with Paragraph 180 of the NPPF which seeks to prevent losses to biodiversity. Instead, it is considered that a proposed "development whose primary objective is to conserve or enhance biodiversity should be supported".
- 8.44 The applicant is committed to the protection of remaining trees during construction. Tree protection measures can be controlled by an appropriately worded condition should this be deemed necessary.
- 8.45 Furthermore, it is considered that the enhancement of a facility intended to benefit the wider conservation of the environment, is a justifiably greater gain than the essential losses to low level flora on the site.

Flood Risk and Drainage

- 8.46 The majority of the site sits within Flood Zone 1, with a small proportion within Flood Zone 2. A Flood Risk Assessment prepared by Clancy Consulting accompanies this application and details the potential flood risks presented to the proposed development. This follows the recommendation provided during preapplication which raised concerns over the adequacy of surface water management.
- 8.47 The FRA concludes that the development is at low risk from all forms of natural flooding and would not increase flooding elsewhere. However, the report does note that there is a medium risk of flooding caused by surcharged sewers and gullies. The FRA recommends Ground floor levels will be set 200mm higher than current ground levels to mitigate against risks of flood.
- 8.48 A Drainage Strategy [DS] and SUDS Assessment prepared by Clancy Consulting provides details of the proposed drainage solution. The drainage arrangements that are proposed are in accordance with LLFA requirements. The DS confirms the 'living roof' proposed will contribute positively to minimising localised risks of flooding by slowing surface run-off while also acting as habitat space. Excess water will be drained freely. The car park will retain a permeable surface with discharge directed towards the existing watercourse.

- 8.49 Foul water will be collected separately and pass into a septic tank / Package Treatment Plant (PTP) which will then be dispersed into a drainage sink. This system has been designed in accordance with Natural England's own guidance on nutrient neutrality and minimise the amount of potential contaminants from entering into soil systems. Under current proposals no connection to the public sewer is proposed.
- 8.50 Providing new sewerage infrastructure is essential to accommodate the proposed use of the site as a research facility, and is in line with Policy WAT 2, Water supply and sewerage, by meeting the needs of a rural site while preventing harmful impacts to local ecosystems and recognised sites of environmental importance.

Parking and Highways

- 8.51 The proposed building will be accessed from the public highway via the existing private access within the northern part of the site. This access is currently used to access the dwellinghouse, existing reserve base building and the external yard area which sits north of the proposed building, by both vehicles and pedestrians. No changes are proposed to the access.

- 8.52 A Transport Note has been prepared by SK Transport and accompanies the planning application. This note demonstrates that given the limited increase in vehicles movements to and from the site the existing access continues to be adequate. Whilst the note recognises the access does not currently achieve the required visibility splays the current activity that is currently served by the access, the absence of any accidents and the presence of the level crossing as a feature that naturally reduces speed, result in an access arrangement that is considered to be safe.
- 8.53 The proposed site plan demonstrates there is adequate space to provide for 7 spaces including one accessible bay. Natural England has confirmed that a maximum of 8 visitors would be on site at any one time as such the proposed parking is adequate considering the use of the site and the number of visitors. There are also 2 electric vehicle charging points proposed and cycle storage in line with standards.
- 8.54 The Transport Note concludes that:
- “the proposal will not significantly change existing movements to the site. It is also shown that while there are limits to the visibility at the site access, there is no history of accidents caused by this and also that the proposal will not intensify the use of the site access to any great effect. Therefore, and in line with Paragraph 111 of NPPF and Policy TRA2 of the Local Plan, the proposal will not have a severe impact on highway operation or unacceptable effects on road safety.”*
- 8.55 This Planning Statement as well as the Transport Note demonstrate that whilst the site is in a rural location it is accessible by non car modes. With regard to the accessibility of the site the Transport Note concludes:
- “Paragraph 105 of NPPF recognises that opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this is certainly reflected at the site. The assessment also shows that while there are opportunities to access the site by sustainable modes of travel, it has to be recognised that the rural location of the site and the operation of the site mean that these do not form realistic alternatives to the private vehicles.*
- Notwithstanding, current visitor access to the site is organised in advance and the majority of trips are taken via sustainable private vehicle means (car sharing and mini bus). This will continue following the introduction of the proposed building. The proposal also provides cycle parking, which is an improvement on existing facilities. In line with Paragraph 110 of NPPF and Policy TRA1 of the Local Plan, the sustainable access measures are appropriate to the type and location of the development. “*
- 8.56 Overall, the proposed development is considered to accord with policies in the Development Plan and the NPPF.

Noise and Vibration

- 8.57 The site is bound by a railway line to the east. The passenger and freight services which utilise the railway line are a notable source of noise and vibration which has the potential to affect present and future users of the site.
- 8.58 A noise and vibration survey and assessment, carried out by Hepworth has recorded the average day and night time noise and vibration levels at the site. The proposed development is not one that is particularly sensitive to noise but the presence of overnight accommodation requires acceptable noise levels to be achieved internally.
- 8.59 Strategic Policy STP 5, Health and wellbeing, requires development proposals that may effect or be effected by pollutants such as air and noise, to demonstrate that appropriate mitigation measures have been considered to alleviate potential risks to people's wellbeing. To ensure the proposed development aligns with this policy, Hepworth's report considers whether mitigation is necessary. The report concludes that given the level of vibration and noise recorded on site and the nature of the proposed use no mitigation is needed.
- 8.60 The proposed development is considered acceptable in terms of Policy STP 5 of the NLP.

Ground Conditions

- 8.61 The site is located on the grounds of the former Beal train station which presents a potential for contaminants within the earthworks beneath the site. In accordance with Policy POL1 of the NLP a geo-environmental ground investigation report prepared by IGE Consulting accompanies this application. This report finds that ground conditions are poor with sand, silty and soft clays present. It is advised that these are common within the area and not unexpected given the site's proximity to the Coast.
- 8.62 The report recommends that suitable construction methods are used to ensure the proposed development can be implemented safely including a 300mm layer of clean topsoil over a geomembrane on any landscaped areas to avoid potential health risks. For the building itself, a gas membrane is suggested below the ground floor due to a conservative approach to potential radon and or gas within the earth.
- 8.63 It is also suggested that an outline remedial strategy may be necessary for any areas where soft landscaping is proposed. However, no soft landscaping is proposed within this application.
- 8.64 While the potential risk is low, subject to the recommended mitigation the development is considered appropriate in line with Policy POL1.

S.106 and CIL

- 8.65 The proposed development is not anticipated to trigger the need for any S.106 requirements. At pre-application stage the County Ecologist raised the proposal may trigger a requirement for contributions towards Coastal Mitigation as set out in Appendix H4 of the NLP. Contributions are required towards coastal mitigation when proposed development is for residential or tourist accommodation. Neither of which apply in this case.
- 8.66 The contributions are collected for development that could adversely affect Northumberland's Coastal Area. The central premise of the proposed development is towards providing a facility that can enable research, education and overall benefit of managing the NNR. The proposed development will result in a benefit for protected habitats in the area and as such it is not considered appropriate or in line with paragraph 57 of the NPPF for a contribution of this nature to be requested for this proposed development.
- 8.67 Northumberland County Council does not have a CIL charging schedule and as such there is no anticipated CIL charge associated with the proposed development.

Conclusion

- 9.1 The proposed development will provide Natural England with a research building to expand its existing reserve base operations and continue its **essential function** in the interests of management and preservation of the Lindisfarne & Newham Bog NNR.
- 9.2 The **bespoke design provides a modest building** that will meet Natural England's mandatory requirements in relation to reserve management. The building has been designed to provide a logical addition to the built form on the existing reserve base at the former Beal Station site. It is a design that incorporates **natural materials such as timber, green roof and a natural colour** palette.
- 9.3 The building fits comfortably into the existing site whilst still enabling adequate parking and manoeuvring space for visitors. Electric vehicle charging points and cycle storage are proposed. The building also includes sustainable elements such as the green roof, low energy lighting, locally sourced materials and an air source heat pump.
- 9.4 This submission demonstrates the proposal would deliver a building that is **attractive, functional and sustainable**.
- 9.5 The benefits to the **long term management of the NNR are critical**. The value the proposed research can provide to both local and national biodiversity is an incredibly positive attribute of the proposed development. The partnership with Newcastle University and the advances in research and educational round the NNR are a central driver of the proposed building.
- 9.6 This statement and supporting documentation has demonstrated that the proposed development is compliant with both national and local planning policy and will provide a valuable research facility that will support long term biodiversity benefits associated with the education and successful management of the NNR.

Appendix 01

Northumberland Local Plan 2016-2036 (March 2022)

Policy STP4 Climate Change Mitigation and Adaptation – proposes that developments should contribute to meeting nationally binding targets to reduce greenhouse gas emissions and proposals should support adaptation to climate change to provide future resilience to climate change.

ECN12 A Strategy for Rural Economic Growth – seeks the developer to support the rural economy through fostering innovations within technologies, facilitating the growth of businesses in rural locations, protecting the rural communities and businesses and supporting accessible hubs of economic growth.

ECN13 Meeting Rural Employment Needs – provide employment opportunities to those living within the area through development that contributes to employment opportunities. This can be through reusing existing buildings for extensions or creating a proposal that follows the character and pattern of the existing settlement.

ECN14 Farm / Rural Diversification – developments should be directly related to agricultural operation and/or for leisure that requires open space or for a business that complies with ECN13. This policy is there to support other policies unless it's for a rural worker dwelling.

QOP1 Design Principles – provides an assessment for development proposals to follow, focusing on the character of the area and supporting the local community and wildlife through adding this proposal. This can often be supported through a great weight given to proposals with an innovative design.

QOP2 Good Design and Amenity – provide a high standard of amenity for current and future users of the development and the surrounding community. Also, development proposals need to manage and consider any effects and mitigation measures through impacts of nature, privacy, physical impact of development and ensuring neighbouring uses are compatible.

QOP5 Sustainable Design and Construction – promote the principle of sustainable, climate-conscious construction and the use of appropriate accreditation schemes to promote high levels of sustainability.

ICT2 New Developments – must be served with high quality communications infrastructure including full fibre broadband connection.

ENV2 Biodiversity and Geodiversity – states that proposals on designated sites will minimise their impact and secure a net gain for biodiversity. The harm to geological conservation must be prevented and opportunities for public access to those features will be provided. It is expected that the ecosystem approach in where the conservation, protection, minimising adverse effects and opportunities to incorporate biodiversity must be used together or individually.

ENV3 Landscape – requires proposals to be recognised through how they affect the landscapes character, the conservation of special qualities, the enjoyment of heritage assets and whether the landscape will be adversely affected.

ENV5 Northumberland Coast Area of Outstanding Natural Beauty – expects considerations towards the sensitivity of the local landscape to accommodate new development, interdependency and intervisibility between landscape and coastal environments and the need to sustain and enhance the character of the area.

WAT2 Water Supply and Sewerage – the provision of a maintained and secured infrastructure that potentially uses existing infrastructure and if new infrastructure is developed it doesn't impact ecosystems or biodiversity as well as contributing to the improvement in water quality.

MIN4 Safeguarding Mineral Resources – The identified areas on the policy map must be protected from unnecessary sterilisation by non-mineral development and applications for non-mineral development in mineral safeguarded areas must complete an examination, consider the impacts and the possibility of extraction.



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