

19th April 2022



To Whom it May Concern  
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Northumberland County Council  
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Dear Sir/Madam

**Applicant / Developer: Dunham Leisure Ltd**

**Address: Land to the west of South Meadows Holiday Park, Belford**

**Proposal: EIA Screening Opinion Request – Full planning application for the expansion of the existing holiday park to deliver up to 240 static caravans, strategic landscaping and associated infrastructure.**

This letter requests an EIA Screening Opinion from Northumberland County Council (“the Council”) under Regulation 6 of the Town and Country Planning (EIA) Regulations 2017 as updated by the Town and Country Planning and Infrastructure Planning (Environmental Impact Assessment) (Amendment) Regulations 2018 (EIA 2017 Regulations as updated).

This Screening Opinion Request is submitted on behalf of Dunham Leisure Ltd as applicant in respect of a planning application for up to 240 static caravans and associate landscaping and infrastructure as an expansion to the west of the existing park. The project includes a vehicular and pedestrian access which connects to existing park infrastructure. A landscape buffer on the periphery of the Site within the applicant’s ownership also forms a key mitigation feature in managing the visual impact of Proposed Development from receptors including the public right of way on the western boundary.

Mindful of the relationship of the Proposed Development with neighbouring committed residential development to the north by a separate developer, we would be obliged if the Council could provide clear consideration of neighbouring development proposals and the likely cumulative effects of neighbouring and wider committed development in the EIA Screening Opinion. Nonetheless, an analysis of likely cumulative effects is also included in this EIA Screening Opinion Request.

**Requirement for Screening under the EIA Regulations**

The Proposed Development is Schedule 2 development as a permanent caravan site (12 e – Tourism and Leisure Projects). The Site is approximately 11.6 hectares in size, exceeding the 1 hectare threshold and would require screening. The need for EIA is not mandatory for all Schedule 2 developments, the Regulations require that an EIA be undertaken where *“the development is likely to have significant effects on the environment by virtue of factors such as its nature, size or location”*.

This EIA Screening Opinion Request provides the local planning authority with information regarding any significant environmental effects that would likely arise as a result of the Proposed Development either individually or cumulatively with existing or committed projects, to the extent that information is currently available.

Regulation 2 of the EIA 2017 Regulations as updated sets out an explanation and interpretation of those terms to which the Regulations are relevant. In determining whether the Proposed Development is likely to give rise

to significant environmental effects, reference should be made to Schedule 3 of the Regulations. This identifies three categories of criteria:-

1. Characteristics of the development such as: Size and design; cumulative effects with existing development and/or approved development; use of natural resources (in particular land, soil, water and biodiversity); production of waste; pollution and nuisances; risk of major accidents and/or disasters relevant to the development concerned (including those caused by climate change, in accordance with scientific knowledge); and the risks to human health (for example due to water contamination or air pollution).
2. Location of the development (by reference to the environmental sensitivity of the area) such as: The existing and approved land use; the relative abundance, availability, quality and regenerative capacity of natural resources (including soil, land, water and biodiversity) in the area and its underground; the absorption capacity of the natural environment, paying particular attention to specified areas; densely populated areas; and landscapes and sites of historical, cultural or archaeological significance.
3. Characteristics of the potential impact, considering the likely significant effects of the development in relation to the above criteria with regard to the impact of development on population and human health, biodiversity, land, soil water, air and climate, material assets, cultural heritage and the landscape, and the interaction between the above factors. Regard should also be had to the magnitude, spatial extent and nature of the impact, its transboundary nature, intensity and complexity, probability, duration, frequency and reversibility, the cumulation of the impact with other existing and/or approved development and the possibility of effectively reducing the impact.

In the light of these, EIA will often be required for Schedule 2 development in three main types of case:-

Major development which are of more than local importance;  
Developments located in particularly environmentally sensitive or vulnerable locations; and/or  
Developments with unusually complex and potentially hazardous environmental effects.

Furthermore, indicative thresholds for a Schedule 2 urban development project whereby EIA may be necessary are outlined in national planning guidance where it is stated that only a very small proportion of Schedule 2 development will require an EIA. Whilst not prescriptive, it is suggested that EIA is unlikely to be necessary unless the types of impact are of a markedly different nature to a typical development proposal or there is a high level of contamination. Where a Site has not been intensively developed before and is over 5ha, the development would most likely need to have significant urbanising effects on a previously non-urbanised area (circa 1,000 dwellings) to be considered EIA development. As such it is suggested that scale is a key determining factor and in this instance a Proposed Development of up to 240 caravans on the edge of a settlement and adjacent to an existing caravan park of over 200 existing pitches would not be markedly different to typical development projects elsewhere in the locality. Nonetheless, it is recognised that in rare cases some smaller developments could result in significant environmental effects (individually or cumulatively) where the surrounding environment is more sensitive and where the threshold is much lower. In short, each project requires consideration in its environmental context.

This EIA Screening Opinion request includes the environmental information required by Regulation 6 of the Regulations. In addition to the enclosed Site Location Plan to identify the land (Appendix 1), it includes details on the following:

- a description of the development, including in particular:

- (i) a description of the physical characteristics of the development and, where relevant, of demolition works;
- (ii) a description of the location of the development, with particular regard to the environmental sensitivity of geographical areas likely to be affected;

- a description of the aspects of the environment likely to be significantly affected by the development;
- to the extent the information is available, a description of any likely significant effects of the proposed development on the environment resulting from—
  - (i) the expected residues and emissions and the production of waste, where relevant; and
  - (ii) the use of natural resources, in particular soil, land, water and biodiversity; and
- such other information or representations as the person making the request may wish to provide or make, including any features of the proposed development or any measures envisaged to avoid or prevent what might otherwise have been significant adverse effects on the environment.

Mindful of the above, the content of this EIA screening opinion request is broken down into the following sections, with currently known mitigation taken into account within Section 3 when reaching a conclusion regarding likely environmental effects.

1. Site location and description;
2. Description of the nature and purpose of the proposals; and
3. Likely environmental effects.

### **The Site Location & Surrounding Development**

The Site is located immediately adjacent to the existing South Meadows Caravan Park which is located to the west of South Road, to the south of Belford.

The Site itself is approximately 11.6 hectares (ha) in size and comprises greenfield land defined by hedgerows. The greenfield land is in agricultural use for crop growing to the north of the Site and a former poultry field to the south of the Site. Whilst the majority of the site is undeveloped land, there is a poultry shed located at the southern edge of the Site. In addition, a row of overhead telegraph poles also cross the Site north-east to south-west, and east to west along the northern boundary. The Site also includes land within the existing holiday park which provides parking and access.

It is bounded:

- To the north by agricultural land (consented for residential development), with the settlement of Belford beyond;
- To the east by the existing South Meadows Caravan park with South road and employment premises beyond;
- To the west by a public right of way and agricultural land beyond; and
- To the south by ancient woodland with agricultural land beyond.

The Site is in a sustainable location as it is part of an existing holiday park on the southern boundary of Belford. It is served by services and amenities in the settlement such as a GP surgery, dentist, post office, chemists, 3 pubs, restaurants and Co-op.

The Site is also served by public transport. The nearest bus stop is located approximately 500m away and is serviced by the X15 or X18 hourly to Newcastle, Morpeth, Alnwick and Berwick.

The Site does not have a planning history given its use for agricultural purposes, nonetheless, the wider park which it would become part of has a planning history which reflects the sustainable expansion of the park over time:

- 21/00265/FUL- Change of Use of existing building from agricultural to Indoor Caravan Storage including the reconstruction of the east gable, replacement of side cladding and erection of enclosing fence on one side.

17/00247/FUL- Change of use of land to touring caravan pitches, with access road and landscaping, and the erection of detached toilet block.

16/04077/FUL- Change of use of land to create stances for touring caravans and sleeping pods, construction of access roads, screening and planting.

12/02351/FUL- Upgrade existing caravan site including increasing the permanent stance numbers, extensive landscaping to site and improvements of existing access.

N/10/B/0217- Change of use of land for touring caravans and camping (part renewal of existing temporary planning permission).

N/00/B/0091- Amendment to condition no.10 of planning permission 97/b/0578/p, and creation of access, and provision of temporary portable accommodation for use as toilet and reception facilities.

In addition to the above applications, these consents have been subject to conditions discharge applications. As a result of the planning history on neighbouring land, the park has planning consent and a licence for the following:

104 static pitches, 172 touring pitches, 12 pods, caravan storage facilities, a reception building, toilet/shower block and associated parking and landscaping.

As such, any likely environmental effects are considered in the context of the existing baseline and the existing development on park.

### **The Environmental Sensitivity of the Site and Surroundings**

Further details of the sensitivity of the Site and its surroundings are contained in the Assessment of Likely Significant Effects below. However, in summary, a search of the development plan and other relevant statutory body records confirms that:

The Site lies predominantly in Flood Zone 1 however, there are minor areas of Flood Zone 2 and 3 located to the south-east.

The Site is located in the Coastal Mitigation Service (Policy ENV2).

The Site is located within the Water Resource Zone (Policy ENV2).

The Site is located adjacent to a Public right of Way

It is located within the nutrient catchment area for the Lindisfarne SPA.

There are no other sensitive receptors or designations within the Site. The following have been considered and discounted. The Site:

Is **not** designated locally, nationally or internationally for its biological importance;

Is **not** designated locally within a Conservation Area;

Is **not** covered by any landscape designations;

Does **not** contain trees subject to a Tree Preservation Order;

Does **not** contain any locally or nationally listed buildings;

Does **not** contain any designated archaeological sites and/or historical features;

Is **not** located with a National Park or World Heritage Site; and

Is **not** located within, or in the vicinity of, an Air Quality Management Area.

With regard to the surrounding area, potentially sensitive receptors comprise the following, in order of approximate distance:

Located adjacent to Ancient Woodland on the south-eastern boundary of the Site.

Located adjacent to Flood Zones 2 and 3 on the banks of Newland Burn to the south-east of the Site

Located approximately 200m east from an area potentially suitable for wind turbines (Policy REN2) which suggests a lower landscape sensitivity.

The Site is approximately 5km west from the coast and the Berwickshire and North Northumberland Coast Special Conservation Area at Budle Bay and the Lindisfarne Nature Reserve and Site of Special Scientific Interest (SSSI) which is designated along the wider coastline.

The Site is 5km from 2 other SSSI at Spindlestone Heughs and Bradford Kames both to the east of the Site. Colour Heugh SSSI and the Bowden Doors LWS is located 5km to the west.

The Bewick and Beanley Moors SSSI is located circa 7km to the south.

The nearest Local Wildlife Site is located at Chapel Crags 1km to the north, with Cragmill Hill at Easington circa 2.5km to the north east.

The boundary of the wider Heritage Coast and Northumberland Coast Area of Outstanding Beauty Designation is approximately 3km to the north east at the closest point. This designation runs along the coast from Berwick upon Tweed to Amble

Designated Heritage Assets at Belford Hall, including a Registered Park and Garden are located within Belford 1.4km to the north.. The northern half of the settlement is also a Conservation Area but this does not abut the park.

The pre-submission draft of the Belford Neighbourhood Plan identifies valued landscapes to the north and west of Belford, but this does not include the Site and its surrounding landscape, nor would the proposal result in significant effects on these landscapes (as discussed in further detail below). This is not yet part of the development plan.

### **A Description of the Proposed Development**

The Proposed Development will comprise planning application for additional static caravan pitches and associated landscaping and infrastructure. As an upper parameter for EIA screening purposes it is assumed that there would be up to a maximum of 240 pitches, subject to an on-going design process and with the final number to be subject to landscape designs. This is a reduction in scale and density by 37 statics when compared to the 277 static pitches assessed by Officers during pre-application feedback.

The physical characteristics of the Proposed Development, treated as upper parameters for EIA screening comprise:

- Up to 240 static caravan pitches with associated parking;
- Reconfiguration of existing statics to accommodate access infrastructure (no increase in existing static pitches);
- Structural landscaping on the periphery of the Site;
- Internal green spaces;
- LPG infrastructure;
- Access infrastructure connecting to the existing park; and
- Other associated infrastructure inclusive of communal EV charging bays, refuse collection, cycle loops at the existing park reception.

Vehicular and pedestrian access and egress would be achieved via the established park access on South Road, vehicles, cyclists and pedestrians would access the park in the usual manner and travel through the central infrastructure to access the western expansion.

The principle of this Proposed Development has been agreed with the Council within a formal pre-application response subject to design and demonstrating adequate environmental and highways mitigation. Informal advice suggested a lower density which has influenced a reduction in numbers and an upper assessment parameter of 240 static pitches. The final number will be subject to on-going design work but it would not exceed this figure.

The LPG compound is also designed and situated subject to standard requirements and stand off distances required by the Health and Safety Executive. The existing park has a licence for the use of LPG gas.

A copy of the current Indicative Layout Parameter plan is Appended. Please see Appendix 2. This plan will form the basis of the proposed parameter plans.

### **The Proposed Development and Neighbouring Committed Development – Likely Cumulative Effects**

The Regulations require the consideration of likely cumulative environmental effects with existing development and/or approved development (which is considered further below). At the time of submitting this EIA screening Opinion Request, it is recognised that all other committed developments comprise entirely separate projects by their nature and there are no interrelationships between them in terms of use, nor do these projects rely on each other for access or delivery. As such, there is no automatic need for EIA to be considered in a scenario where several smaller projects, in practice, form part of a wider project which could be considered EIA development.

Nonetheless, it is recognised that the Proposed Development is located in close proximity to committed self-build residential development to the immediate north, separated by the public right of way. The section below includes details of this, including the wider committed development within the Belford area. The environmental information within this EIA Screening Opinion Request has considered the proximity between these projects in its analysis in order to conclude whether this would result in any new likely significant environmental effects following mitigation.

### **Wider Committed Developments - Likely Cumulative Effects**

In accordance with the EIA 2017 Regulations (as updated), this Screening Opinion Request has included an assessment of any direct and indirect cumulative effects arising from the inter-relationships between different impacts arising from the Proposed Development. These are considered and reported below in the “Likely Significant Effects on the Environment” section where applicable and using the technical information currently available.

In addition to the consideration of the proximity of the Proposed Development to the self-build residential development to the north, the project is also considered alongside any other existing and/or approved developments in the wider area surrounding the Site. The objective is to identify whether combined effects from the Proposed Development or impacts from several developments, and which individually might be insignificant could, when considered together, likely cause a further significant direct or indirect and cumulative impact requiring mitigation.

Schedule 4 clarifies that the cumulative assessment should focus on existing and/or approved projects. The assessment is only capable of being carried out based on the information available at the time of assessment, in this instance this comprises the conclusions of technical reports associated with each of the relevant planning consents.

For the purposes of cumulative assessment, we have identified the following committed developments and for completeness, other live planning applications, which could potentially contribute to cumulative environmental effects. Their locations are identified in Appendix 3.

**22/03367/OUT:** Resubmitted outline application with all matters reserved for construction of a new extension to golf clubhouse, children play park, crazy golf course, two tennis courts, farm shop/hardware with offices above golf driving range, microbrewery and 21 dwellings [Awaiting Decision].

**19/01346/OUT:** Outline application for erection of 37 residential dwellings [Granted May 2021].

**22/04529/REM:** Reserved Matters Application for access, appearance, landscaping, layout and scale for 37 residential dwellings with associated infrastructure, landscaping, public open space, and sustainable urban drainage features on approved application 19/01346/OUT [Awaiting Decision].



**18/03606/FUL:** Full application for change of use from agricultural land to industrial site for the erection of manufacturing building with offices, a show room, and parking for the relocation of business premises to a purpose built new facility [Granted December 2021].

**19/03481/VARYCO:** Variation of condition 2 (approved plans) pursuant to planning application 07/B/1058 in order to substitute house types in phases 4,5, and 6 which will vary the layout to 88 dwellings, whilst 26 remain affordable over the whole site [Approved December 2019].

**17/04574/FUL:** Proposed sites for 9 new houses and change of use from agricultural to a 14 unit Camp/Caravan Site [Approved November 2018].

**16/00353/VAREIA:** Variation of condition 2 of planning permission 14/02432/VARCCM to extend the duration of mineral extraction and restoration until December 2032 to extract the remaining 3 million tonnes of whinstone [Granted June 2016].

**15/01267/CCMEIA:** Proposed extension to existing whinstone quarry involving retention of access road and site infrastructure facilities [Granted December 2015].

If the Council is aware of any other committed developments or proposals currently in the planning system that it considers will need to be assessed in terms of potential cumulative effects it would be appreciated if these could also be identified as part of any EIA screening opinion in due course.

A consideration of the likely cumulative effects associated with the above committed developments is considered proportionately for EIA screening purposes in relation to each environmental topic in the "Likely Significant Effects on the Environment" section below. On the whole, it is the view of the technical experts providing inputs into this letter that having considered the reported effects of these committed developments, their approved mitigation and proposed mitigation for the Proposed Development that significant cumulative environmental effects can be avoided and are therefore unlikely.

### **Likely Significant Effects on the Environment**

A description of the aspects of the environment likely to be significantly affected by the development is set out below. Where possible, the technical experts providing environmental information have estimated the level of likely effect taking into account what is known about the Proposed Development and the Site and Surroundings. The sensitivity of receptors and likely scale of impact is considered based on information available (inclusive of mitigation) to reach a conclusion whether significant residual environmental effects are likely. Where it is possible to do so, the scale for quantifying and reporting beneficial and adverse effects is typically neutral, negligible, minor, moderate, major or substantial with moderate effects or above having the potential to be significant (however this can differ in some instances, for example landscape which assumes effects greater than moderate are significant). Where there is not sufficient information to quantify the likely effect, the technical expert has provided a reasoned conclusion as to whether significant environmental effects are likely.

### **Construction Phase Mitigation - Waste Management Plan and Construction and Environmental Management Plan (Use of Natural Resources and Waste)**

The construction process will be typical of any other holiday park development and will not require demolition of existing structures, rather the re-positioning of existing infrastructure to provide access. Nonetheless, all development projects will inevitably generate demand for energy, materials, water and other natural resources. The use of these resources can be minimised through construction site best practice and by maximising the amount of materials sent for re-use or recycling. These commitments would be qualified through the production of a Construction Environmental Management Plan (CEMP) and a Site Waste Management Plan (SWMP). Given that these actions are standard practice to minimise resource use there would be no significant impact on the use of natural resources and EIA would not be required.

Whilst a CEMP or SWMP has not yet been prepared, it is assumed for the purposes of mitigation that a standard CEMP/SWMP will be submitted with the application/would be conditional to any planning consent and as such, typical measures relating to noise management, dust suppression, storage of materials, health and safety, wheel washing would apply. These are assumed for the purposes of the commentary below.

### *Pollution and Nuisances*

Given the absence of any significant contamination, the risk of the release of contaminated residues via dust or surface run off is low (see further assessment by Roberts below). Nonetheless, construction activities have the potential to generate dust and surface run-off. This will be controlled by measures that will be set out in a CEMP such as damping down and wheel washing and appropriate Site drainage. These processes are standard site best practice measures and an EIA would not be required to specify them.

### Residues and Emissions

To the extent the information is available, residues and emissions are considered in relation to air quality, flood risk and ground conditions and contamination in the relevant topics below.

With regard to Greenhouse gases, in the absence of a more detailed design or energy strategy it is not possible to quantify CO<sub>2</sub> emissions, nor is this a requirement of the Regulations for EIA Screening. However, as this does not comprise residential development and Building Regulations do not apply to design in the same manner, there are no benchmarks for assessment within the IEMA guidance. Nonetheless, it is anticipated that good practice would be applied during construction and new static caravans would typically comprise modern and energy efficient caravans in line with the latest industry guidance as it works toward net zero. IEMA guidance only predicts a likely significant effect where a project would not be fully consistent with applicable existing and emerging policy requirements and good practice design standards for projects of its type.<sup>1</sup> Indeed, these structures are not used as intensively and as regularly as a residential dwelling with each occupant also having their own permanent place of residence. South Meadows is also located within walking distance of nearby shops and services, further reducing emissions for shorter vehicle trips. As such, significant environmental effects are unlikely.

### Production of Waste

With regard to the production of construction waste, it is possible to provide a high level estimate based on BRE Waste Benchmark Data (June 2012)<sup>2</sup>. This estimated total has been calculated using the average tonnes/100m<sup>2</sup> for residential proposals (15.3 tonnes per 100 sqm). In simple terms, a standard dwelling at 100 sqm per dwelling would generate 15.3 tonnes of waste. If this is multiplied by 240 it equates to 3,670 tonnes of waste. As a standard caravan is typically smaller than a dwelling and requires much less in the way of foundations and construction than 50sqm per pitch could be a more realistic (albeit still a worst case) estimate at which point the waste estimate would range from 1,830 to 3,670 for the proposals. Nonetheless, it is anticipated that waste would be typical for a development project of this size and nature and would be managed in the usual manner as required via the SWMP. Furthermore, when compared to a standard urban project, the waste and removal of material would take place over a longer period with the work generally less intensive and responsive to longer term demand.

With regard to operational waste associated with the Proposed Development, the Site will be accessible to the municipal waste and recycling collection service and will be managed in the same manner as the existing park. Recycling bin collections will also take place during the operational phase to minimise the proportion of waste being sent to landfill. The types of waste arisings and the method of treatment are commonplace. Based on the above that the production of waste is unlikely to be significant in the context of scale and nature.

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<sup>1</sup> IEMA – Assessing Green House Gas Emissions and Evaluating their Significance February 2022.

<sup>2</sup> Source: BRE Waste Benchmark Data, October 2017 \*Source: BRE Waste Benchmark Data, January 2010



## The Use of Natural Resources- Soil, Land, Water and Biodiversity

To the extent the information is available, text is provided in relation to the use of natural resources, namely soil, land, water and biodiversity in the relevant topics below.

### Implications of Climate Change

The topics below also consider the implications of climate change as predicted by UKCP18 where possible and appropriate.

The latest projections, UKCP18, provides the most recent evidence on projected climate changes for the UK with which to plan<sup>3</sup>. The headline findings include:

**Temperature:** the average temperature over the most recent decade (2009-2018) has been on average 0.3°C warmer than the 1981-2010 average and 0.9°C warmer than the 1961-1990 average. By the end of the 21st century, all areas of the UK are projected to be warmer, more so in summer than in winter.

**Precipitation:** the most recent decade (2009-2018) has been on average 1% wetter than 1981-2010 and 5% wetter than 1961-1990 for the UK overall. Rainfall patterns across the UK are not uniform and vary on seasonal and regional scales and will continue to vary in the future.

**Sea Level:** Mean sea level around the UK has risen by about 17 cm since the start of the 20<sup>th</sup> century (when corrected for land movement). The pattern of sea level rise is not uniform across the UK. Sea level rise is less in the north and more in the south, this is mainly due to the movement of land, up and down.

Within a high emissions scenario, it is predicted that annual temperatures in 2070 across the UK will be 1.3- 5.1 °C warmer in summer and 0.6 – 3.8°C warmer in winter.

In considering whether climate change is likely to effect the conclusions associated with each topic, in particular drainage and flood risk, it is these broad changes in temperature, rainfall or sea level which are considered along with standard mitigation measures relating to energy efficient design and modern building and flood resilience methods.

### **Ground Conditions (Natural Resources – Land and Soil)**

With regard to the existing land use, it is currently agricultural land which is recognised as good to moderate within the strategic north east map and only a moderate chance of comprising BMV<sup>4</sup>. However, any loss of agricultural land is below the 20ha BMV consultation threshold set by Natural England. As such in terms of scale the impact on existing land use is not considered significant with substantial amounts of similar grade land available in the area. With regard to ground conditions and potential contaminants, further information is provided by Roberts Environmental below as technical experts.

*Text provided by Roberts Environmental*

#### Baseline Conditions

Historically, the Site comprised undeveloped land from the earliest mapping dated 1865 until present day. A sheep wash was denoted on site from mapping dated 1967 up until 1994. The site currently comprises two undeveloped agricultural fields. Historically and currently, surrounding areas has largely comprised undeveloped agricultural land with a poultry shed adjacent south and sparse residential properties located within 250m of the property.

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<sup>3</sup> Met office summary of UKCP18 findings August 2022.

<sup>4</sup> Likelihood of Best and Most Versatile (BMV) Agricultural Land & Scale Regional ALC maps- Strategic scale map North East Region (ALC013, ALC001)

### *Physical Ground Conditions*

According to published BGS data and Geological Map, England and Wales, 26 (Berwick upon Tweed) and 4 (Holy Island) the site is not mapped as having significant deposits of Made Ground materials present on or immediately adjacent to the Site. The majority of the Site is shown to be underlain by superficial deposits comprising Devensian Till. The south-eastern most corner is recorded as being underlain by Alluvium comprising clay, silt, sand and gravel. The Site is underlain by solid deposits comprising the Alston Formation of limestone, sandstone, siltstone and mudstone.

Based on the current and historic usage of the Site, no potentially significant sources of pervasive contamination have been identified. Localised residual contamination may exist associated with the former sheep wash and the agricultural usage of the site (pesticides). No significant sources of ground/stythe gas have been identified on Site or within the immediate surrounding area.

### Mitigation

<b>Potential Impacts</b>	<b>Description</b>	<b>Mitigation</b>
Physical	Short-term shallow soil disturbance/compaction from earthworks / construction.	Surface soils intended for re-use on site to be stripped, handled and stockpiled with care so as to minimise loss and avoid structural deterioration. Landscaping works to recover soil structure in soft landscaped areas.
	Short term increase in sediment input to surface water.	Adoption of appropriate site soil and surface water management techniques.
	Limited changes in hydrological regime.	No mitigation necessary. Changes anticipated to be negligible.
Chemical	Short-term, acute impact of residual soil contamination to construction workers and off-site users.	During excavations, construction and maintenance workers should be subject to risk assessment and maintain a watching brief. Workers should use appropriate procedures to manage residual risk. Appropriate dust control measures should be adopted to prevent off-site migration.
	Short term increase in sediment/mobile contaminant input to surface water.	Adoption of appropriate site soil and surface water management techniques.
	Long-term impact of residual soil contamination on future site users.	Validation testing of surface soils in future soft landscaped areas to confirm suitability for use. Clean imported soils provided if required.
	Long term impact of proposed development on soil and groundwater quality.	Site drainage to collect surface water run-off from roads and hardstanding areas. Dedicated waste storage areas to be provided and subject to regular inspection and maintenance.

### Likely Significant Effects Post Mitigation – The Proposed Development

Likely significant effects associated with the construction and operational phases, post mitigation, are all considered to be negligible.

### Likely Significant Effects Post Mitigation – The Proposed Development & Cumulative Development

For the purposes of cumulative assessment, it is recognised that the area is rural in nature and any isolated contamination associated with individual committed developments will have been subject to their own programme of phase 2 investigations and remediation where appropriate. Likely significant cumulative effects associated with the construction and operational phases, post mitigation, are all considered to be negligible.

### **Water Flood Risk and Drainage (Natural Resources- Water, Expected Residues)**

*Text provided by Northpoint*

#### **Baseline Conditions**

The Site is situated immediately to the west of the existing caravan park along its full length, comprising arable land sloping from west to east over a height of 8 to 9 metres at 1 in 25. to 1 in 30, and nominally from north to south at circa 1 in 250 along the length of the boundary between the existing and proposed, which is stepped.

Whilst the Environment Agency Flood Maps narrative suggests that all of the site is in Flood Zone 3, it can be seen from examination of the maps that the flooding in both pluvial and fluvial conditions are limited to the boundary between the existing park and the Proposed Development, in the extreme south east corner which is wooded. This is borne out visually and confirmed by topographic survey.

The Site topography determines that both pluvial and fluvial flooding are restricted to the close margins of the watercourses adjacent the Site, all as shown on the EA Flood Maps.

There are no other sources of flooding other than that shown on the EA Flood Maps. It is evident also that the source of present flooding emanates from water flowing down the Newland Burn along the south east boundary of the site. There is little that can be done about this other than to slow the time of concentration of the runoff from the site in the infrastructure design.

#### **Mitigation**

##### *Construction*

It will be necessary during the construction phase to prevent surface water with suspended solids from entering the existing water courses during all conditions, and the following measures will be necessary to ensure this. The main area of concern is obviously the down grade boundary on the south east of the site and measures should be concentrated there.

- Phasing and limiting areas of topsoil strip to immediate build areas.
- Incorporating boards along impoundment areas and temporary drainage ditches down grade of works.
- Use of hay bales or similar sediment traps within channels.
- Installation of a settlement lagoon at final discharge to watercourse with flocculation as necessary, prior to discharge.
- Ensure discharge rate is restricted to allowable rates by installation of flow control device.
- Undertake regular mechanical road sweeping to reduce buildup of mud and debris on new roads and roads adjacent to the development.

A full CEMP should be prepared and approved prior to commencement. It is considered that implementation of the CEMP incorporating the measures above should reduce any potentially harmful environmental effects and ensure they are insignificant.

##### *Operation*

As can be seen from the preliminary development layout, road infrastructure has followed the contours produced by the topographic survey which will allow slow flow of rainwater on to grass margins with collection in swales and ponds slowing the run off further. These will flow eventually to ponds located in the low land along the eastern boundary before discharging through flow controls to the Newland Burn in the south east corner of the Site.

The various constrictions within the system will slow the time of concentration of storm water from the development to probably less than at present, but the outfall discharge design will reduced the flow to at most greenfield runoff plus 40% for climate change. The swales and ponds will be incorporated in the landscaping design to provide additional flora and fauna. There will be no adverse effect from flooding from the park extension.

#### *Proposed Foul Drainage*

The existing park sewerage system was connected to the Public Sewer in 2018 during which provision was made for connection for future expansion. The Proposed Development will therefore connect to the existing infrastructure and discharge to the Public Sewer. There will be no adverse environmental impact from sewage disposal, the discharge having been rendered nutrient neutral by offset.

#### *Proposed Surface Water*

BGS data shows the Site to lie in the Middle Limestone strata and nearby boreholes indicate a high water table with shallow boulder clay under. Infiltration for surface water disposal is therefore not an option and discharge will be to watercourse as existing.

As stated at Design Development above, surface water will be attenuated by swales and ponds with flow controls to ensure that flooding elsewhere in the water system will not be adversely affected, and possibly improved.

#### Likely Significant Effects Post Mitigation – The Proposed Development

Based on the above mitigation, it is therefore evident that any environmental effects during construction and operation can be managed through the CEMP and via design. Nutrient Neutrality is considered in further detail separately, but is also considered achievable. As such any residual effects are unlikely to be significant in relation to surface or foul water discharge.

#### Likely Significant Effects Post Mitigation – The Proposed Development & Cumulative Development

With regard to committed development, including development to the north, each Site will be required to ensure that there is no adverse impacts on flood risk on site or elsewhere. Indeed, foul capacity has been planned for in advance on the park and as such there are no likely significant cumulative effects with other sites as identified.

### **Biodiversity (Natural Resources - Biodiversity)**

*Text provided by BSG Ecology*

#### Baseline Conditions

*Desk Study*

### *Designated Sites*

There are no statutorily designated sites located within 2 km of the site. The Berwickshire and North Northumberland Coast SAC, North Northumberland Dunes SAC, Lindisfarne SPA and Ramsar site and Northumbria Coast SPA and Ramsar site are all c.4-5 km to the north-east of the Site. The Site is located within the Impact Risk Zones for these designated sites, and the proposed development is of a type and scale that has been identified as having potential to have an adverse impact on the designated sites.

There is a Local Wildlife Site (LWS) within the desk study area: Chapel Craggs-Chesters-Sonnyside Hills LWS is c.1km to the north of the Site. The LWS, which consists of woodland and grassland habitats, is separated from the Site by Belford and its associated road network.

### *Field Survey*

The walkover survey completed in May 2021 shows that the Site consists of two adjacent fields, the northern field being arable and the southern field being poor semi-improved grassland. The fields are separated by a hedgerow and a hedgerow is also present between the fields and the existing Holiday Park to the east. An access track runs along the northern and western edges of the two fields. Tall ruderal vegetation is present at various locations within the Site, and short strips of broadleaved tree planting are present in the southern part of the Site near the former chicken shed. To the south of the Site is a watercourse and beyond this is an area of broadleaved woodland that is identified on MAGIC as being 'Ancient & Semi-Natural Woodland'. The woodland boundary includes the watercourse and its banks.

### *Protected mammals*

No evidence of badger presence was found within the Site during a walkover survey in 2021 but evidence of badger presence was found in the adjacent woodland (i.e., to the south of the watercourse). No active setts are present in locations that could be affected by the proposed works. During survey in 2021 no signs of otter or water vole presence were recorded along the section of watercourse that flows alongside the Site.

### *Bats*

There are no buildings, structures or trees within the Site that have suitability for roosting bats. Trees within the woodland adjacent to the southern boundary of the Site may have suitability for roosting bats; however, none of these trees will be affected by the Proposed Development.

The habitats that dominate the Site are considered to offer very limited opportunities for foraging bats (Walsh & Harris, 2006a,b). Habitats outside but adjacent to the south may provide good opportunities for foraging bats. Static bat detector surveys in 2021 (detectors were deployed in hedgerows at NU10993311 and NU10903290 recorded small numbers of calls from common pipistrelle, soprano pipistrelle, noctule and a *Myotis* sp. The results from the static bat detectors are presented in Appendix 4. Overall, it is considered that the Site is of low conservation importance in relation to roosting, foraging and commuting bats.

### *Breeding birds*

Breeding bird characterisation surveys identified a total of 31 species within the Site. Of these only 11 species were considered to be nesting within the Site or outside the Site but close enough that their territories were likely to include parts of the Site. The results of the breeding bird characterisation surveys are presented in Appendix 5.

Most recorded species were associated with the hedgerows and the woodland in the southern part of the site. No ground nesting birds were recorded in the Site. Nesting birds recorded within or near the Site include two Birds of Conservation Concern (BoCC) Red List species (Stanbury *et al*, 2021): house sparrow *Passer domesticus* and tree sparrow *Passer montanus*.

### *Other S.41 species*

During site visits in 2021 only one brown hare *Lepus europaeus* was seen within an arable field outside and to the west of the Site. The arable and grassland habitats within the Site are considered to have limited suitability for European hedgehog *Erinaceus europaeus*. Red squirrel *Sciurus vulgaris* has previously been recorded within 2 km of the site; however, there is no suitable habitat within the Site.

### Mitigation

It is expected that best practice measures will be adopted throughout the construction phase of the development to mitigate pollution impacts on the adjacent watercourse.

As the Site is located within 10 km of the coast designated SAC, SPA and Ramsar sites, the Proposed Development (i.e., a holiday park that will result in an increase in the number of visitors to the area) is 'likely to have a significant effect' on one or more of these sites as a result of recreational impacts. Northumberland County Council (NCC) has implemented a Coastal Mitigation Strategy to protect European sites, which is supported by Natural England. The Strategy includes a series of mitigation measures that will be delivered by the Council and that will be funded through financial contributions from developers secured through a Section 106 agreement. This is considered by NCC and NE to fully mitigate impacts on the coast designated SAC, SPA and Ramsar sites.

Habitat loss will be compensated through a combination of habitat creation and enhancement within the site and, if necessary, within off-site land. An assessment will be completed using Defra biodiversity metric 4 to demonstrate that a biodiversity net gain can be achieved. The Proposed Development includes a landscape buffer alongside the ancient woodland adjacent to the southern boundary of the Site. The proposed landscaping scheme includes new habitats that will benefit foraging and commuting bats. Any new artificial lighting that is proposed will be designed with reference to best practice guidance to avoid light spillage onto habitats used by bats (Bat Conservation Trust & Institute of Lighting Professionals, 2018).

Bird nesting was mostly recorded within hedgerows, which will largely be retained and enhanced, with the exception of short sections of hedgerow that will be removed to accommodate access roads. In the absence of mitigation and compensation this hedgerow loss may result in the loss of single nest sites for house sparrow, dunnock and blackbird. As previously noted, any proposed external lighting will be designed with reference to best practice guidance for bats. This will also benefit nesting birds.

The removal of short sections of hedgerow could have an adverse impact on any active nests that are present if it is carried out during the breeding bird season. To mitigate impacts on nesting birds hedgerow removal will ideally be carried out between late August and mid-February, which would avoid the bird breeding season. If work that will directly affect bird nesting habitat has to take place during the bird breeding season, then the area will be surveyed for active bird nests by a suitably qualified ecologist before the proposed work is carried out. If active bird nests are present, then work will be delayed in that area until nesting activity ceases.

### Likely Significant Effects Post Mitigation – The Proposed Development

#### *Construction Stage*

The construction stage of the Proposed Development is not likely to have a significant effect on designated sites if best practice measures are adopted to mitigate pollution impacts on the nearby watercourse. The existing arable and grassland habitats within the Site will necessarily be lost to accommodate the Proposed Development. As neither of these are priority habitats their loss is not likely to be significant with reference to relevant planning policy.

Short sections of hedgerow will be lost to accommodate access roads but most of the existing hedgerows will be retained. This will be complemented by hedgerow creation, which is expected to result in an overall increase in this habitat.



The proposed measures will mitigate impacts on breeding birds with newly created habitats likely to provide nesting and feeding opportunities for a range of species. Whilst some birds may be displaced, others are expected to utilize the new habitats, particularly once they have matured.

Adoption of best practice guidance for lighting design will ensure that impacts on breeding birds and foraging bats arising from light spillage will be mitigated. No other protected or other notable species are likely to be significantly affected by the Proposed Development.

#### *Operation Stage*

The inclusion of a landscape buffer alongside the ancient woodland adjacent to the southern boundary of the Site will ensure the long-term buffering of this habitat from the effects of the Proposed Development.

The proposed landscaping will deliver benefits for a range of species including breeding birds and bats. Adoption of best practice guidance for lighting design will ensure that impacts on breeding birds and foraging bats will be mitigated during all stages of the development.

#### Likely Significant Effects Post Mitigation – The Proposed Development & Cumulative Development

#### *Construction Stage*

The results of surveys completed in 2021 have led to the conclusion that the Site supports common and widespread habitats and few protected or otherwise notable fauna. No significant effects on the flora and fauna is expected as long as the proposed mitigation measures are adopted.

Assessment of the projects listed in the table below has led to the conclusion that no significant cumulative effects are likely for the following reasons. In most cases the separation distance between the development sites is sufficiently large that regular movement of faunal species between them is unlikely. The presence of existing development or habitats of low ecological value between the development sites means that habitat connectivity is poor. Ecological surveys have concluded that the development sites support a limited range of protected species, and impacts on important ecological features have been mitigated through the adoption of appropriate measures.

<b>Application Reference</b>	<b>Description of Development</b>	<b>Ecological assessment</b>
<b>22/03367/OUT</b>	Resubmission- Outline application with all matters reserved for construction of new extension to golf clubhouse, children play park, crazy golf course, two tennis courts, farm shop/hardware with offices above golf driving range, microbrewery and 21 dwellings.	The site supports habitats of low ecological importance. An ecological assessment concluded that there would be negligible effects on bats (great crested newt was considered to be absent). No significant cumulative effects are likely.
<b>19/01346/OUT</b>	Outline application for residential development of 37 houses	The permission includes conditions for the provision of a Landscape and Biodiversity Management Plan, bat and bird box provision, hedgerow protection and small mammal protection. The applicant agreed to provide a contribution to the council's Coastal Mitigation Scheme to mitigate impacts on European sites at the coast. No significant cumulative effects are likely.

Application Reference	Description of Development	Ecological assessment
<b>22/04529/REM</b>	Reserved Matters Application for access, appearance, landscaping, layout and scale for 37 residential houses with associated infrastructure, landscaping, public open space and sustainable urban drainage feature on approved application 19/01346/OUT.	Ecology survey shows that the habitats presented are of low ecological importance. There is limited potential for protected species on site. The planning authority has agreed that proposed avoidance, mitigation and enhancement measures are appropriate. No significant cumulative effects are likely.
<b>18/03606/FUL</b>	Full application for change of use from agricultural land to industrial site for the erection of manufacturing building with offices, show room, parking, for the relocation of business premises to a purpose built new facility.	The site comprises improved grassland of low ecological importance. There is limited potential for protected species on site. Impacts on ecological features will be mitigated or compensation provided. No significant cumulative effects are likely.
<b>19/03481/VARYCO</b>	Variation of condition 2 (approved plans) pursuant to planning application 07/B/1058 in order to substitute house types in phases 4,5 and 6 which will vary the layout to 88 dwellings, whilst 26 remain affordable over the whole site.	No significant ecological effects have been identified as the proposed variation will not result in any additional ecological impacts. No significant cumulative effects are likely.
<b>17/04574/FUL</b>	Proposed sites for 9 new houses and change of use of agricultural to 14 unit.	The proposed development will result in the loss of habitat that are common and widespread in the locality. No evidence of protected species was found but the site may have value for nesting birds. Measures were proposed to mitigate impacts. No significant cumulative effects are likely.
<b>16/00353/VAREIA</b>	Variation of condition 2 of planning permission 14/02432/VARCCM to extend the duration of mineral extraction and restoration until December 2032 to extract the remaining 3 million tonnes of whinstone.	No significant effects on important ecological features were considered likely subject to implementation of agreed mitigation measures. No significant cumulative effects are likely.
<b>15/01267/CCMEIA</b>	Proposed extension to existing whinstone quarry involving retention of access road and site infrastructure facilities.	The proposed development will impact on bat roosts, badger setts and breeding birds. Measures were proposed to mitigate impacts on important ecological features. The restoration scheme will deliver biodiversity benefits. No significant cumulative effects are likely.

### Operation Stage

No significant cumulative effects are likely during the operation stage of the development as impacts on important ecological features have been mitigated through the adoption of appropriate measures. These measures apply to operation stage effects as well as construction stage effects.

#### Appendices

Appendix 4 – Bat Detector Surveys

Appendix 5 – Breeding Bird Characterisation Survey

Appendix 6- Ecology Study References

#### **Landscape (Natural Resources - Land)**

*Text provided by TGP*

##### Baseline Conditions

The Proposed Development sits within National Character Area 1: North Northumberland Coastal Plain and Landscape Character Type: Farmed Coastal Plain (Lucker sub-section), as defined by the

Northumberland Landscape Character Assessment, August 2010. The Site comprises an area of arable and pasture farmland to the west of the existing South Meadows Holiday Park and a route through the existing park to the main road. The farmland is bounded by hedgerows to the north, east and west in part, there is a strong hedgerow running west to east through the centre of the site dividing the field. To the southern boundary of the site lies an area of ancient woodland around the Newlands Burn and an existing chicken shed. The landform falls from approximately 64.5m AOD in the west, down to 53.5m AOD in the east. The area surrounding the former chicken shed is set at around 60m AOD and the landform falls from the west and north towards this. The lowest point of the site is to the south east corner, at 53m AOD while the highest point is to the south west corner, at 66m AOD. To the west of the proposed site there is a PRoW running along the western boundary with arable farmland beyond that. The field boundaries are predominantly hedged.

A review of landscape designations using the MAGIC Map website has shown that there are a number of designations within a 5km radius of the site, namely the Northumberland Coast Area of Outstanding Natural Beauty (AONB), Northumbria Coast RAMSAR, Lindisfarne National Nature Reserve, Special Protection Area and Site of Special Scientific Interest (SSSI), Berwickshire and North Northumberland Coast Special Area of Conservation, Berwick and Bearley Moor SSSI, Spindleheughs SSSI, Bradford Kames SSSI, Belford Conservation Area, Belford Hall Registered Park and Garden, St Oswald's Way / Northumberland Coast Path and National Cycle Route 1. There are also a number of public rights of way, listed buildings, areas of Ancient Woodland and Scheduled Monuments within the 5km radius. The site is located within no landscape designations.

##### Mitigation

Retention and enhancement of the existing landscape features and landscape mitigation such as new tree and hedgerow planting to strengthen existing hedges and create new where needed are proposed to reduce

potential visual effects on receptors, particularly the PRoW to the west and housing / Conservation Area to the north. This hedge planting would be further enhanced with native shrub planting where space allows.

New hedgerow, hedgerow trees and grassland areas are proposed which contribute towards biodiversity net gain on-site and habitat creation. Within the development the areas of caravans will be divided by native hedgerow and ornamental tree planting which will help to break up the massing of the development from more distant views as well as closer ones. SUDs ponds and basins will assist with drainage of site as well as providing further habitat enhancement opportunities.

The construction of the proposed development would follow a Construction Environmental Management Plan and Method Statements which would detail the proposed arrangements for soil removal, storage and replacement. Specific measures during construction would include:

- Land clearance and occupation will be limited to the necessary works;
- During excavation, subsoil and topsoil would be separated and retained in order to maximise the quality of the soil for reinstatement;
- Tracking of plant will be limited to the infrastructure location to minimise ground compaction to nearby areas;
- The existing vegetation coverage would be protected to BS 5837:2012;
- Reinstatement and greening of the site would be carried out as soon as possible following completion of the works;
- Planting of the landscape mitigation would be carried out during the following planting season on completion of the works.

Likely Significant Effects Post Mitigation – The Proposed Development

TGP’s proposed methodology for the LVIA (and the emerging landscape strategy plan) has been included at Appendix 7 for information and reference for how the effects will be evaluated. Below is an extract of the table setting out what is considered a significant effect in landscape terms (**Major / Moderate or Major**).

**Correlation of Sensitivity & Magnitude of Change to determine Significance of Effects**

<b>Landscape &amp; Visual Sensitivity</b>	High	<b>Moderate/ Minor</b>	<b>Moderate</b>	<b>Major/ Moderate</b>	<b>Major</b>
	Medium	<b>Minor</b>	<b>Moderate/ Minor</b>	<b>Moderate</b>	<b>Major/ Moderate</b>
	Low	<b>Minor/ None</b>	<b>Minor</b>	<b>Moderate/ Minor</b>	<b>Moderate</b>
	Negligible	<b>None</b>	<b>Minor/ None</b>	<b>Minor</b>	<b>Moderate/ Minor</b>
		Negligible	Slight	Moderate	Substantial
	<b>Magnitude of Change</b>				

*Construction*

The works would give rise to landscape effects during construction, with earthmoving equipment regrading the land, site activity, access road, signage and traffic management around the Proposed Development. Direct effects would in the main be concentrated within the site itself. The effects would be short term, localised and not likely to be considered significant.

The Proposed Development is located within no landscape designations, therefore there will be no effect on any sensitive landscapes. The visual effects during construction would be temporary and intermittent and minimised by good site management. There would be visibility of operations associated with construction of the hardstanding, fencing, lighting and access road for the development and vehicle movements to and from the site on the adjacent highways. There would be views for those living along the southern edge of Belford and those using the adjacent footpath network. The visual effects during the construction phase would be for a limited duration, localised and temporary and not likely to be considered significant.

The ZVI suggests there will be some visual effects on the Belford Conservation Area, Belford Hall Registered Park and Garden, Old Mousen Scheduled Monument, St Oswald's Way / Northumberland Coast Path, Dinnings Wood Ancient Woodland and at a distance of 4km the Northumberland Coast AONB designations. It is considered that the visual effects on these designations will not be significant due to distance, landform, intervening built form and vegetation. Any proposed mitigation will help to reduce the visual effects further.

Reported effects would also likely be intermittent given that the actual construction phase would take place in response to market demand for new caravan pitches.

### *Operation*

Following the construction of the Proposed Development and implementation / establishment of the mitigation measures set out above, there would be a residual effect on the areas of the Site which have changed from farmland to access roads and hardstanding for caravans. There would, however be creation of new native tree and shrub areas, grassland, new hedgerow boundaries and strengthened existing hedgerows, which will bring about improvements to the biodiversity of the Site and beneficial landscape effects to the Proposed Development. The residual visual effects following construction and implementation / establishment of the mitigation, would see some views of the site from Footpath 206/007 which runs along the western boundary of the Site and the southern edge of Belford to the north. Strengthening the northern and western boundaries with native tree, shrub and hedge planting will help to reduce the visual impact of the Proposed Development from the north and along Footpath 206/007 to the west of the Site, while the proposed planting within the Proposed Development planting will help to screen views from the east and break up the massing of the Proposed Development and set it within the surrounding landscape and context of the existing holiday park. The residual effects during the operational phase are therefore considered to be localised and not likely to be significant.

### Likely Significant Effects Post Mitigation – The Proposed Development & Cumulative Development

#### *Construction*

It is considered there would be no likely significant cumulative effects on the National Character Area in connection with the approved developments 19/01346/OUT, 18/03606/FUL, 19/03481/VARYCO, 17/04574/FUL, 16/00353/VAREIA, 15/01267/CCMEIA and the pending applications 22/03367/OUT and 22/04529/REM. There may be some cumulative effects on the local landscape character type, but these effects would be short term, localised and not likely to be considered significant.

The following approved and pending applications are all set within the Farmed Coastal Plain (Lucker sub-section) LCT and as such would have a cumulative landscape effect on the LCT during the construction period; 19/01346/OUT, 18/03606/FUL, 19/03481/VARYCO, 17/04574/FUL, 16/00353/VAREIA, 15/01267/CCMEIA, 22/03367/OUT and 22/04529/REM. The effects of each would be localised but cumulatively there would be an impact on the landscape character. The effects would be short term, localised and not likely to be considered significant. The cumulative visual effects during construction would be temporary and intermittent and minimised by good site management on each of the development sites. There would be visibility of operations associated with construction of infrastructure and access roads for the developments and vehicle movements to and from the Site on the adjacent highways. It is considered that there would only be a cumulative visual impact for approved developments 19/01346/OUT, 18/03606/FUL, 19/03481/VARYCO and pending developments 22/03367/OUT and 22/04529/REM. Depending on when each was constructed there may be a

short term effect for the duration of the construction period, although this will likely only affect users of Footpath 206/007 and those living around the southern and south eastern edge of Belford.

### *Operation*

Following the construction and establishment of each of the cumulative development sites there would be some residual cumulative landscape effects where areas of hardstanding are now found where there was farmland. These are not considered likely to be significant however, due to the mitigation / restoration measures set out for each project. The cumulative effects may well be beneficial as they would see in part the creation of new valuable habitat and the restoration of land lost to quarrying. The cumulative visual effects during the operational phase would be reduced by the mitigation proposed on each of the developments, which will help to screen and break up their massing. Any residual effects would be limited to the footpaths adjacent to the sites and those living around the southern and south eastern edge of Belford.

### *Climate Change*

Climate change has the potential to result in environmental stress to existing and proposed habitats and plant species due to temperature or rainfall extremes. The existing habitats to be retained as part of the landscape proposals are likely to have some resilience to climate change effects as will the proposed plant species and habitats. It is considered that the landscape proposals and habitat strategy, in the face of climate change, would not result in any new significant adverse impacts.

## **Heritage (Archaeology)**

### *Text provided by Pre Construct*

#### Baseline Conditions

The archaeological and built heritage baseline conditions including the Site and a 1km radius study area measured from the centre of the Proposed Development have been assessed.

The assessment has determined that there are no known heritage assets within the site and 58 known heritage assets within the study area. These comprise one prehistoric asset, three medieval assets, 51 post-medieval assets, one modern asset and two assets of unknown date. Additionally, an ongoing programme of staged archaeological mitigation undertaken immediately north of the site (planning ref. 19/01346/OUT) has uncovered a number of features of archaeological significance.

The assessment has further determined that the site has a moderate potential to contain as yet unknown archaeological remains of prehistoric date and a low potential to contain remains from the Roman, early medieval, medieval, post-medieval and modern periods. Any such remains, should they be present, are likely to be of local, low heritage value (sensitivity).

Within the study area there are 32 Grade II listed buildings, a Grade II registered park and garden (Belford Hall), and one conservation area (Belford). All but two of these statutorily protected assets (i.e. the Grade II listed Newlands House and farm buildings; DBA nos. 23 and 50) lie within Belford conservation area. The conservation area, registered park and garden and all of the Grade II listed buildings (which collectively may be termed 'built heritage') are of medium heritage value (sensitivity).

#### Mitigation

While construction details for the Proposed Development are not yet available, it is assumed that below-ground excavations will be required to facilitate the construction of site compounds, temporary and permanent roads, caravan pitches, drainage systems, service runs and areas of hard and soft landscaping. These works will



result in a moderate to major adverse direct impact to any archaeological remains that may be present within the Site.

A staged programme of archaeological mitigation in advance of construction commencing is proposed. This will take the form of a geophysical survey and a subsequent trial trench evaluation (if the results of the geophysical survey indicate that one is required). Should they be warranted by the results of the first two stages, further archaeological investigations may be necessary in advance of construction commencing. No mitigation measures for built heritage assets are recommended.

#### Likely Significant Effects Post Mitigation – The Proposed Development

##### *Construction stage*

Given the predicted low heritage value of any archaeological remains that may be present within the site, and taking into account the proposed mitigation measures, the proposed development will not result in any significant effects on archaeological receptors.

As there are no built heritage assets within the Site, the Proposed Development would not have any direct impacts on built heritage assets during construction. However, temporary and permanent indirect impacts on built heritage assets can arise from changes to their setting during the construction phase. An initial assessment has concluded that due to the nature of their setting, their distance from the Proposed Development and the lack of intervisibility between heritage assets and the Site, the Proposed Development will have a neutral to negligible adverse indirect impact on built heritage assets within the study area. This low level of impact means that there will be no significant effects on built heritage receptors during the construction stage.

##### *Operational stage*

During the operation of the Proposed Development, no further groundworks or construction activities are anticipated. As such, there would be no possibility of further direct impacts occurring to heritage assets within the Site.

Impacts on heritage assets arising from changes to their setting are considered permanent construction effects, although any such effects would, without mitigation, continue throughout the operation of the Proposed Development. This means that the negligible to neutral level of impact identified for the construction phase would continue into the operation stage. This is not significant.

#### Likely Significant Effects Post Mitigation – The Proposed Development & Cumulative Development

##### *Construction phase*

Consideration has been given to the possibility of cumulative effects arising as the result of seven nearby schemes:

- A) Land South of Rogerson Road (planning ref. 19/01346/OUT)
- B) Land South of Rogerson Road (planning ref. 22/04529/REM)
- C) Belford Golf Club and Driving Range (planning ref. 22/03367/OUT)
- D) Land South West of Bricksheds Junction (planning ref. 18/03606/FUL)
- E) Land Rear of Blue Bell Hotel (planning ref. 17/04574/FUL)
- F) Belford Quarry (planning ref. 16/00353/VAREIA)
- G) Cemex UK Cragmill Quarry (planning ref. 15/01267/CCMEIA)

During the construction phase of the Proposed Development any combination of schemes (a) to (g) will not give rise to any cumulative effects on archaeological receptors. There will be no cumulative effects during the construction stage on built heritage assets from any combination of schemes (e), (f) and (g).

The combination of impacts from the Proposed Development with those from schemes (a), (b), (c) and (d) on some elements of the setting of Belford conservation area and Belford Hall registered park and garden may result in a cumulative adverse effect on the heritage value of these assets. However, any such cumulative effect would not be significant.

#### *Operational phase*

Cumulative impacts on heritage assets arising from changes to their setting are considered permanent construction stage effects, although any such effects would, without mitigation, also continue throughout the operation of the proposed development.

### **Arboriculture (Natural Resources)**

*Text provided by Elliot Consulting*

#### Baseline Conditions

Elliott Consultancy Limited have undertaken a pre-design site survey and will provide ongoing arboricultural guidance relating to development of the Site, including an assessment of any potential impacts on trees and hedges, and all mitigation, remedial works, or countermeasures that can be undertaken to address these impacts. All reports and guidance will be in full accordance with BS5837:2012 '*Trees in relation to Design, Demolition and Construction – Recommendations*'.

Coverage of individual trees within the site is largely limited to young and semi-mature trees planted adjacent to the existing access track serving the storage facility. Hedgerows bound and delineate the two fields that make up the site. These tree and hedgerow features were generally classified as moderate quality with value provided as low-level screening and future potential, rather than for any specific individual arboricultural or wider-landscape value. To the south of the site is a woodland, parts of which are designated as Ancient and Semi-Natural. The woodland was classified as High quality. In line with the NPPF a 15-metre buffer zone has been applied to the edge of the designated area.

#### Mitigation

Two small sections of Hedgerow 3, and one small section of Hedgerow 4 would need to be removed to create the access routes shown on the indicative layout. Both hedgerows were classified as Category B2 and provide low level screening which will be of benefit to retain. Each point where the indicative vehicle route intersects with the hedgerows is likely to result in an estimated 6 metre section of hedgerow being removed. Beyond this, no other arboricultural impacts would be expected. The indicative layout details linear shrub/hedge planting between many of the units and on the boundary of the Site which would more than compensate for the minor losses required.

#### Likely Significant Effects Post Mitigation – The Proposed Development

##### *Construction*

Detailed layout designs for expansion of the holiday park are expected to take account of the tree, hedgerow and woodland constraints wherever possible. It is likely that small sections of Hedgerows 3 and 4 will need to be removed to create the vehicular access routes. No incursions into the ancient woodland buffer zone are expected.

No likely significant environmental effects are expected due to tree or hedge loss of damage during the construction phase of the project. A minor short-term adverse impact due to initial removal of hedgerow sections will be experienced but is not significant and also temporary given the mitigation planting.

### *Operation*

No likely significant environmental effects are expected due to tree or hedgerow loss or damage during the operational phase of the project. Tree and hedgerow planting as part of the proposals will have a positive arboricultural impact in the longer-term with an expected increase in tree and hedgerow cover but not significant beyond the Site boundary.

It is not expected that climate change will significantly impact on the expected arboricultural outcomes of the proposal nor would there be any impacts on human health or the risk of accidents associated with the condition of existing trees.

### Likely Significant Effects Post Mitigation – The Proposed Development & Cumulative Development

#### *Construction*

No increase in any cumulative impacts will occur. Other planning proposals within the area have independently managed the loss and replacement of tree and hedge features, and as this site will have only a small and temporary adverse impact due to initial hedge removal, it is not expected that this will be significant.

#### *Operation*

No significant increase in any cumulative impacts will occur. Mitigatory tree and hedge planting is expected to have a positive impact as a result of the delivery of committed development but one that is of no more than local significance and therefore not significant in the context of EIA.

### **Highways**

#### Text provided by LTP

Local Transport Projects Ltd (LTP) has been commissioned to produce a Transport Assessment (TA) and Travel Plan (TP) to accompany a planning application which seeks to provide up to 240 static caravans/lodges at South Meadows Caravan Park located to the south of the village of Belford, Northumberland. The TA will provide a detailed assessment of the likely transport impact of the proposals and is to be produced in line with adopted local and national guidance. The TP will provide a strategy for encouraging sustainable travel at the site (i.e. walking, cycling, car share, use of more sustainable vehicles and public transport).

Criteria for assessing the impact of the development on traffic and transport will be defined, which will be based on Planning Practice Guidance (PPG) 'Travel Plans, Transport Assessment and Statements in Decision Taking' and Institute of Environmental Management & Assessment (IEMA) 'Guidelines for the Environmental Assessment of Road Traffic'.

The IEMA guidance (1993) outlines a number of potential environmental impacts of increased traffic flow that should be considered, as outlined below:

- Severance;
- Driver Delay;
- Pedestrian/Cyclist Delay & Amenity;
- Accidents & Safety;
- Ecological Impact (if necessary, expected to be assessed in a separate chapter);
- Hazardous Loads (not expected to be applicable to the proposed development);
- Noise & Vibration (if necessary, expected to be assessed in a separate chapter);
- Air Pollution/Dust & Dirt (if necessary, expected to be assessed in a separate chapter); and
- Visual Impact (if necessary, expected to be assessed in a separate chapter).

In order to inform this initial EIA screening, the possible impact of the proposals in terms of the following traffic impacts has been provisionally considered, all of which are primarily related to the level of traffic increase associated with the proposals:

Severance;  
Driver Delay;  
Pedestrian/Cyclist Delay & Amenity; and  
Accidents & Safety.

### Baseline Conditions

South Meadows Caravan Park is located to the south of the village of Belford and has successfully operated for a number of years. Given its established operation, the site is not considered sensitive in highway or traffic terms. Vehicular access to the site is currently provided via a simple priority T-junction with South Road which connects the site to Belford and the wider highway network via the B6349 and the A1. Pedestrian access to the Site is provided by a footway on the western side of South Road which provides a continuous connection to the wider pedestrian network within Belford.

If required, traffic count surveys will be undertaken on the local highway network to inform the TA, although given the predicted level of traffic generation for the scheme, this is not currently expected to be necessary. The survey locations would be agreed with Northumberland County Council (NCC) as the local highway authority.

Site assessments have been undertaken to understand the existing park operation and its relationship with the surrounding highway network. As part of this, a preliminary sustainability assessment undertaken as part of both the TA/TP has demonstrated that the Site is well located to facilitate trips to/from the site via active travel modes (i.e. walking and cycling) as well as public transport.

In order to thoroughly assess the local highway network a road safety assessment was carried out and identified that there are no known road safety issues associated with the current use of the site and this is not expected to change as a result of the Proposed Development.

### Mitigation

Of the traffic flows generated by the Proposed Development, the vast majority are expected to be made by car/smaller vehicles, which generally have a smaller environmental impact than larger vehicles. The existing park currently provides two communal Electric Vehicle Charging Points (EVCP) and this provision will likely be expanded as part of the proposals. In addition, each of the new pitches is to be provided with its own cycle storage facility. The existing site already generates a number of trips by sustainable modes and the TP that will be produced for the Proposed Development planning application will set out an approach to further encourage travel by sustainable modes to/from the Site. This includes a range of specific measures which seek to encourage walking, cycling and public transport use.

Pedestrian and cycle infrastructure improvements are proposed as part of the development and include the widening of the existing footpath on the western side of South Road to form a 3.0m wide shared foot/cycleway. This will include dropped kerbs and tactile paving at crossing points as appropriate and provide an enhanced connection for pedestrians and cyclists to Belford. It is also proposed to provide a new uncontrolled pedestrian crossing point on South Road between the existing north and southbound bus stops adjacent to the Fire Station.

Prior to the construction of the Proposed Development, it is expected that a site Construction Traffic Management Plan (CTMP) will be produced and implemented at the site in order to minimise the traffic and environmental impacts of the construction period. Appropriate access to/from the site for construction vehicles is provided by the site access which has direct connections to the B6349 and the A1 which is part of the Strategic Road Network (SRN).

Likely Significant Effects Post Mitigation – The Proposed Development

*Construction*

The projected construction traffic generation for the Proposed Development is not currently known, and is unlikely to be known until a Contractor is appointed, which typically occurs after a planning consent is granted. However, typical construction traffic levels for the scale of the proposals are not large, usually fewer than 100 two-way trips per day, and often much lower than this level of daily trips. It is expected that the construction traffic levels will be notably lower than the traffic levels generated by the Proposed Development once operational (see below).

It is also noted that the expansion of the South Meadows Caravan Park is expected to be delivered over a number of years which will limit construction traffic volumes taking place at any one time. Moreover, the existing park has been developed over a number of years to its current size without any adverse construction impacts. Construction traffic typically occurs outside of the busiest network peak periods, with movements spread across the working day (usually with no/limited weekend deliveries/operations).

There are usually different vehicle types utilised during the construction phase of similar sites, including cars and small vans, mainly associated with staff and sub-contractors, as well as larger rigid and articulated delivery vehicles (Heavy Goods Vehicles – HGVs), and some other bespoke vehicle types (e.g. concrete mixers). The majority of construction traffic movements is likely to be associated with staff, although it is acknowledged that the site will generate some HGV movements.

There are no restrictions on the size (i.e. weight/height/width) of vehicles on the construction traffic route to/from the site, with all HGVs expected to travel via South Road and the B6349 to utilise the nearby A1 which forms part of the Strategic Road Network.

As discussed, a CTMP is expected to be produced for the proposals, likely secured via a planning condition. The CTMP would be expected to include management measures to ensure that the impact of construction traffic can be suitably mitigated, such as measures to restrict the routing of larger HGVs, the timings of movements, wheel cleaning, delivery scheduling, protecting pedestrians and more. Therefore, subject to the implementation of a suitable CTMP, and in the context of the likely level of construction traffic generation of the Site, it is expected that the impact of the Proposed Development during the construction phase will be negligible/minor adverse (and therefore not significant/severe) in terms of the key transport impacts of severance, driver delay, pedestrian/cyclist delay and amenity, and accidents/safety.

*Operational Stage*

The projected vehicle trip generation of the Proposed Development has been provisionally calculated as part of the preliminary TA. The table below summarises the expected weekday traffic generation associated with the Proposed Development.

**Weekday Traffic Generation of Proposals**

Time	IN	OUT	TOTAL
06:00-07:00	2	6	8
07:00-08:00	2	4	6
08:00-09:00	6	8	14
09:00-10:00	10	17	27

10:00-11:00	15	27	42
11:00-12:00	15	32	47
12:00-13:00	18	25	43
13:00-14:00	17	22	39
14:00-15:00	22	18	40
15:00-16:00	26	18	44
16:00-17:00	28	18	46
17:00-18:00	26	17	43
18:00-19:00	21	13	34
19:00-20:00	12	11	23
20:00-21:00	11	7	18
21:00-22:00	6	5	11
22:00-23:00	4	4	8
<b>TOTAL</b>	<b>241</b>	<b>252</b>	<b>493</b>

The table above shows that the proposed expansion to South Meadows Caravan Park would result in an additional 14 two-way vehicle trips during the typical AM network peak hour (08:00-09:00) and 43 two-way trips during the PM peak hour (17:00-18:00), with 493 additional trips per day (06:00-23:00).

Given this level of peak hour and daily traffic generation for the Site, once operational and at full capacity, it is expected that the impact of the proposals will be negligible/minor adverse (and therefore not significant/severe) in terms of the key transport ES impacts of severance, driver delay, pedestrian/cyclist delay and amenity, and accidents/safety.

#### Likely Significant Effects Post Mitigation – The Proposed Development & Cumulative Development

There are number of consented and proposed developments within the local area which are summarised below:

22/03367/OUT – An outline application was submitted in September 2022 and is currently pending consideration for the 'construction of new extension to golf clubhouse, children play park, crazy golf course, two tennis courts, farm shop/hardware with offices above golf driving range, microbrewery and 21 dwellings' at the Belford Golf Club. The application was supported with an associated Transport Assessment (EGG, 2022).

19/01346/OUT – An outline application was submitted in April 2019 and was subsequently approved in May 2021 for a 'residential development of 37 houses (all matters reserved)' on land to the south of Rogerson Road. A subsequent reserved matters application (ref: 22/04529/REM) was submitted in December 2022 and is currently pending consideration for the 'access, appearance, landscaping, layout and scale' of the proposed development.

18/03606/FUL – A full planning application was submitted in October 2018 and was subsequently approved in December 2021 for the 'change of use from agricultural land to industrial site for the erection of manufacturing building with offices, showroom, parking, for the re-location of existing business premises to a purpose-built new facility' at land south-west of the Bricksheds junction. The application was supported by an associated Transport Statement (SAJ Transport Consultants, 2020).

19/03481/VARYCO – A variation of planning condition application was submitted in August 2019 and was subsequently approved in December 2019 for the 'variation of condition 2 pursuant to planning application 07/B/1058 in order to substitute house types 4,5 and 6 which will vary the layout to 88 dwellings, whilst 26 remain affordable over the whole site' at land to the west of Raynham Road.



17/04574/FUL – A full planning application was submitted in December 2017 and was subsequently approved in November 2018 for 'proposed sites for 9 new houses and change of use of agricultural to 14 unit camp/caravan site – amended 03/04/18' at land to the rear of the Blue Bell Hotel, West Street, Belford.

16/00353/VAREIA – A variation of planning condition application was submitted in February 2016 and was subsequently approved in June 2016 for the 'variation of condition 2 of planning permission 14/02432/VARCCM to the extend the duration of mineral extraction and restoration until December 2032 to extract the remaining 3 million tonnes of whinstone' at the Belford Quarry Easington. The application was supported by an associated Environmental Impact Assessment (EIA) (WA LLP, 2016).

15/01267/CCMEIA – A county matter with EIA application was submitted in April 2015 and was subsequently approved in December 2015 for the proposed extension to existing whinstone quarry involving retention of access and site infrastructure facilities' at the Cragmill Quarry.

### *Construction Phase*

It is accepted that the traffic flows on some of the local roads will be higher in the future, as a result of the committed developments (assuming they are consented and then implemented), but also as a result of traffic growing. However, this is not expected to materially change the level of traffic flow or characteristics on any of the key local roads that are pertinent to the proposed development.

Therefore, consistent with the above assessment, subject to the implementation of a suitable CTMP, and with consideration of wider committed developments, it is expected that the impact of the proposals during the construction phase will be negligible/minor adverse (and therefore not significant/severe) in terms of the key transport impacts of severance, driver delay, pedestrian/cyclist delay and amenity, and accidents/safety.

### *Operational Phase*

As above, the committed developments are not expected to materially change the level of traffic flow or characteristics on any of the key local roads that are pertinent to the Proposed Development.

Therefore, consistent with the above assessment, and with consideration of wider committed developments, it is expected that the impact of the proposals during the operational phase will be negligible/minor adverse (and therefore not significant/severe) in terms of the key transport impacts of severance, driver delay, pedestrian/cyclist delay and amenity, and accidents/safety.

The above assessments and the work undertaken as part of the TA and TP demonstrates that the transport and environmental impacts of the proposed development are not expected to be significant in EIA terms.

## **Lighting**

### *Text provided by Sine Consulting*

#### Baseline Conditions

The existing site currently comprises two open fields, separated via a length of hedging which runs from south-west to north-east through the centre of the site. Along the west boundary runs an access road to a storage shed which sits at the most southern point of the site. The access road and open fields are currently unlit areas, however, the shed accommodates local wall mounted luminaires which illuminate the Site.

The existing caravan site is minimally lit, utilising small column mounted luminaires strategically mounted around points of interest only, such as the entrance road, junctions and local to the reception block.

It is proposed that a similar approach will be used for the new development, utilising newer, high efficiency and effective lighting technologies to ensure the environmental effects of the development are kept to an absolute minimum whilst providing a suitable and safe level of illuminance.

Mitigation

The lighting design for the site, both under construction and operation, shall be developed utilising the appropriate lighting techniques with the utmost consideration to the surrounding landscape and potential ecological receptors.

The detailed design shall be carried out in consideration of current relevant lighting standards and guidance such as:

- Institute of Lighting Professionals: Guidance Note GN01/21 The reduction of Obtrusive Light (2021)
- CIBSE Lighting Guide 6 (2016) The Exterior Environment
- BS EN 13201-2:2015 Road lighting Part 2: Performance requirements
- Guidance Note 08/18 – Bats and Artificial Lighting in the UK.

The main objectives of the lighting design are as follows:

- To limit light pollution and upward light.
- To limit obtrusive light, spill light / trespass light and glare to neighbouring land and properties.
- To provide a safe and adequate level of illuminance for the proposed exterior areas, consisting of entrances/exits, access routes to lodges/caravan pitches for cars, pedestrians and cycles.
- To minimise effects on local wildlife in particular local bat populations including migratory habits

The ILP guidance notes recommend that the immediate environment is classified systematically as show in the following table:

Table 11.1: ILP Guidance Notes environmental zones

Zone	Surrounding	Lighting environment	Examples
E0	Protected	Dark	UNESCO Starlight Reserves, IDA Dark Sky Parks
E1	Natural	Intrinsically dark	National Parks, Areas of Outstanding Natural Beauty etc
E2	Rural	Low district brightness	Village or relatively dark outer suburban locations
E3	Suburban	Medium district brightness	Small town centres or suburban locations
E4	Urban	High district brightness	Town/city centres with high levels of night-time activity

11.2.8 ILP Guidance Notes then make recommendations for limiting obtrusive light (light pollution) appropriately according to the environmental zone in which the lighting would be situated. The stringency depends on the capacity to absorb lighting effects, with E0 requiring the tightest level of control and E4 the lowest.

The Site may be deemed as E3 given the descriptions above in comparison to the site location and surrounding areas, however in the interest of mitigation we would recommend the site be designed to Zone E2, maximum upward light ratio 2.5% to limit sky glow.

The Proposed Development shall comprise of directional LED luminaires with shielded light sources to prevent any unwanted light spill, focusing the light only to areas where it is required. The nature of the Site does not demand high lighting levels and lighting will be limited as far as reasonably practicable.

The colour temperature of the proposed luminaires shall be selected strategically and shall be no more than 3000K in colour temperature. This warmer light colour emits less blue light, which is a key contributor to sky glow, helping to keep impact on ecological receptors and light pollution at a minimum. LED lighting will be of lower UV content (410-750nm). Research shows that while lower UV components attract fewer invertebrates, warmer colour temperatures with peak wavelengths greater than 550nm (~3000°K) cause less impacts on bats (Stone, 2012, 2015a, 2015b).

External lighting will be controlled via a timeclock and photocell arrangement to ensure external lighting will only be illuminated when necessary.

#### Likely Significant Effects Post Mitigation – The Proposed Development

##### *Construction*

During the construction stage, care shall be taken to direct luminaires downwards and keep upward light to a minimum. Despite this, some tasks may require occasional upward lighting which could temporarily contribute a small amount of upward lighting to the site. This could be mitigated by carrying out these tasks within daylight hours and keeping night-time working to a minimum. If the mitigation strategies are adhered to there would be minimal effects to the site and surrounding area and these effects would not be significant.

##### *Operation*

The nature of the site and implementation of these mitigation strategies would ensure that light spill and light pollution is extremely limited resulting in minimal impact to the surrounding landscape and ecological receptors and would not be significant.

#### Likely Significant Effects Post Mitigation – The Proposed Development & Cumulative Development

##### *Construction*

Lighting associated with construction works would temporarily increase the extent of visible light sources should any night-time work be undertaken. This may minimally increase light pollution and be visible from nearby committed developments but would be temporary and limited to a small number of evening hours. The magnitude of the effect during construction stage is predicted to be minimal and not significant.

##### *Operation*

During operation, due to the implementation of effective mitigation strategies, the magnitude of the effect on the surrounding area and ecological receptors is predicted to be negligible. Light spill and pollution would be managed and would not expand further than the proposed Site boundary.

#### **Air Quality**

##### *Text provided by NJD*

##### Baseline Conditions

The Site is not located within or adjacent to an existing Air Quality Management Area (AQMA).

Although no background monitoring is undertaken in the locality, based on the Defra mapped background concentrations, levels of particulate matter in the locality are well below the relevant annual air quality objectives.

### Mitigation

Dust associated with the construction phase of the Proposed Development will be controlled following best practice measures and will be implemented via a Construction Environmental Management Plan.

### Likely Significant Effects Post Mitigation – The Proposed Development

#### *Construction*

Potential sources of emissions to air resulting from the development include the emissions of dust during the construction phase activities, i.e., construction of internal roads and hardstanding. With best practice control measures implemented, it is anticipated that dust generated through the construction process will not result in any significant environmental effects on local air quality.

#### *Operation*

There will be no significant increase in traffic associated with the Proposed Development and therefore during the operational phase there will be no significant environmental effects on local air quality.

### Likely Significant Effects Post Mitigation – The Proposed Development & Cumulative Development

With regards to committed development in the locality and potential cumulative effect on dust emissions associated with construction, each permitted scheme will be subject to a site-specific CEMP or equivalent best practice measures. Overall, the cumulative effect during construction is therefore deemed unlikely to be significant.

As there will be no significant increase in traffic, during the operational phase there will be no significant cumulative environmental effects on local air quality.

## **Noise**

### *Text provided by NJD*

#### Baseline Conditions

Based on the Site location, noise associated with distant road traffic on the local road network is likely to be the dominant noise source. Noise associated with use of the existing caravan park will also be present. Noise associated with the use of additional static caravan pitches may be audible once operational.

### Mitigation

Localised noise emissions during the construction phase can be managed and limited through application of best control measures detailed within a Construction Environmental Management Plan (CEMP).

Noise associated with the use of the additional static caravans will be similar in nature to that currently experienced from the existing use of the Site. However, due to the increase in number of pitches, a documented Noise Management Plan (or an extension of existing park management procedures) will be implemented to control noise levels from users of the Site. The park is currently subject to management arrangements which prevent unacceptable noise for other holiday makers and neighbours.

### Likely Significant Effects Post Mitigation – The Proposed Development

#### Construction

Following the implementation of a CEMP, it is considered that the potential environmental effects of the Proposed Development during the construction phase will be reduced to a residual effect that is unlikely to be significant.

#### Operation

During the operational phase, with the implementation of a Noise Management Plan or application of existing park management measures, the Proposed Development will not give rise to significant noise emissions.

### Likely Significant Effects Post Mitigation – The Proposed Development & Cumulative Development

#### Construction

With regards to committed development in the locality and potential cumulative effect on noise emissions associated with construction, each permitted scheme will be subject to a site-specific CEMP or equivalent best practice measures. Overall, the cumulative effect during construction is therefore deemed to be not significant.

#### Operation

The closest committed development is proposed residential use to the north of the Site (planning reference 19/01346/OUT). Based on the residential nature of this committed development, the cumulative noise effect during the operation stage is deemed to be not significant.

Due to the intervening distance between the site and additional wider committed development in the area, and the nature of the Proposed Development, the overall cumulative noise effect is overall considered to be not significant.

#### Nutrients

An assessment has been undertaken by Byrne Looby which considers the nutrient budget for the Proposed Development, indeed it considers a development of 250 static caravans which is greater than the upper parameter for the wider assessments included in this EIA screening opinion request. The Site is within the catchment area for the Lindisfarne Special Protection Area and Ramsar which is designated by Natural England as requiring “nutrient mitigation”.

Caravan Parks do not fit into the standard model nutrient calculator as the parks are maintained for guests and there is a low occupancy which does not release significant nutrients from the land use constantly or at a rate expected for a normal residential development. For the purposes assessment, the 2.4 population increase only applies to a 30% occupancy rate which has been submitted by the applicant to the Local Authority for a separate nutrient report associated with a smaller application for touring caravans on the Park. A nutrient mitigation balance has been undertaken for the proposed increase in occupancy following the methodologies as set out in Natural England’s neutrality guidance. This methodology has been normalised to reflect the actual annual occupancy rates.

The accompanying report by Byrne Looby (Appendix 8) demonstrates that when taking into account remaining elements of the former poultry field to the South and the removal of crop growing agricultural fields (i.e both within the Site) which have their own nutrient load, then the change of use to a holiday park (which generates a reduced amount of nitrogen than the baseline) then nutrient neutrality is achievable. In achieving this significant environmental effects on the Lindisfarne SPA would be avoided without the need for further mitigation off-Site. The nutrient budget calculations would be revised for the final Proposed Development once a planning application is submitted, but this would be below the 250 static caravans considered as an estimate

in the preliminary report. Indeed, as also recognised in the report, Dunham Leisure have available land to the west of the Site and public right of way that is also used for agriculture. Whilst it is not considered necessary to achieve neutrality, it is evident that all or part of this land could also be taken out of production or converted to woodland if additional mitigation was required in due course. Therefore with an demonstrably achievable route to mitigation, it is appropriate to conclude that significant environmental effects could be avoided in due course and that this matter could be dealt with via the planning process and would not require consideration part of an Environmental Impact Assessment.

### **Population/Human Health**

Whilst there is no definition of population and human health in the EIA regulations, IEMA guidance<sup>5</sup> makes reference to two broad categories, “population health” and “human health effects”. The former considering factors such as improved access to activities for all, improved access to community facilities and community groups or indeed new economic benefits within the local economy as a result of a Proposed Development. There has been no detailed assessment of the socio economic impact of this Proposed Development on the population by the applicant at the time of requesting an EIA Screening Opinion. Nonetheless, it is anticipated that there will be some full and part time job creation associated with the construction phase and on-going maintenance and other roles on park as capacity increases during operation. Furthermore, a key benefit of the Proposed Development is the contribution it makes to the County more generally as visitor spend. The 2019 UK estimates for visitor spend off-site<sup>6</sup> calculated an average daily spend of £32 off-site for owners of static caravans. This is likely conservative given a lack of facilities on park.

The estimated amount of visitor spend and the number of anticipated jobs will be quantified in the forthcoming planning application based on a final number of pitches and a typical 30% occupancy. Whilst they are anticipated to have a material beneficial impact on the local economy, it will not be of a strategic scale sufficient to warrant a bespoke economic assessment via EIA which would only apply to any potentially strategically significant effects on employment and visitor spend in the context of a county wide baseline. It is anticipated that benefits could be reported and considered adequately as part of the planning process.

With regard to health and well-being, the Proposed Development would have a beneficial impact on qualitative targets outlined within the NPPF such as providing better access to green infrastructure, natural green spaces and areas of recreation within both the countryside and coast. However, the scale of the expansion of the existing park is not a strategic leisure proposal and as such, the scale of the provision would not be sufficient to trigger EIA and warrant a bespoke Health Impact Assessment. The proposals do not propose new community facilities but holiday makers would not require these in the same manner as they would when in residential accommodation, they would however, be more likely to undertake more informal sport and recreation.

Human health and wellbeing can be influenced by a range of environmental, social and economic factors. As such, “population and human health” as a topic is reliant on a range of inter-related technical disciplines, for example Air Quality, Noise and Vibration and Traffic and Transport. On the basis that none of these topics predict likely significant effects, no likely significant effects on population and human health are also anticipated. Furthermore, mitigation measures adopted as part of the construction and operation of the Proposed Development would focus on precursors to health and wellbeing outcomes, therefore providing an opportunity for intervention to prevent any adverse health outcome. EIA is not necessary in the absence of likely significant effects.

### **Vulnerability to Major Accidents or Disasters**

IEMA guidance regarding the topic of Major Accidents<sup>7</sup> and Disasters clarifies that the level of effort required at the screening stage for major accidents and/or disasters is likely to be minimal. During screening it should

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<sup>5</sup> the IEMA Primer on Health In Environmental Impact Assessment – A Primer for a Proportionate Approach (2017).

<sup>6</sup> The 2019 Economic Benefit Report: Holiday Parks and Campsites in the UK

<sup>7</sup> Major Accidents and Disasters in EIA: A Primer (September 2020) - IEMA



be sufficient to identify if a development has a vulnerability to major accidents and/or disasters and to consider whether a development could lead to a significant effect.

A major accident is an event (for instance, train derailment or major road traffic accident) that threatens immediate or delayed serious environmental effects to human health, welfare and/or the environment and requires the use of resources beyond those of the developer or its appointed representatives (i.e. contractors) to manage. This can result from man-made or natural hazards. A disaster is a man-made/external hazard (such as an act of terrorism) or a natural hazard (such as an earthquake) with the potential to cause an event or situation that meets the definition of a major accident.

Whilst there has been no bespoke assessment of this matter at the time of requesting an EIA Screening Opinion, IEMA clarifies that in general, major accidents and/or disasters should only be considered necessary as part of an assessment where the development has the potential to cause the loss of life, permanent injury and/ or temporary or permanent destruction of an environmental receptor which cannot be restored through minor clean-up and restoration. Consideration of the following high level questions ( taking into account mitigation and without necessarily providing evidence at screening stage) is advised:

Is the development a source of hazard itself that could result in a major accident and/or disaster occurring?

Does the development interact with any sources of external hazards that may make it vulnerable to a major accident and/or disaster?

If an external major accident and/or disaster occurred, would the existence of the development increase the risk of a significant effect to an environmental receptor occurring?

For EIA Screening the guidance concludes that if a development is not vulnerable to major accidents and/or disasters and is not likely to increase vulnerability elsewhere, it is unlikely to lead to an event that would cause a significant environmental effect upon a receptor. In these circumstances, it should be valid to propose that the requirement for EIA is not triggered in relation to major accidents and/or disasters risks.

In this instance, the Proposed Development as a tourism and leisure project is not likely to comprise the source of a major hazard. With regard to external sources, the Proposed Development is also located at least 500m from South Road and 800m from the A1 (at the nearest point on the eastern boundary). As such, it is considered unlikely that there will be a direct pathway between a potential source of accidents and environmental receptors on Site. Indeed, development in this broad location has been deemed acceptable to the immediate north and east in the form of committed residential dwellings and existing tourism and leisure development. Furthermore, there are no known environmental factors which could constitute natural hazards. In short, the Proposed Development is not considered hazardous or likely to be at significant risk from external factors in a manner which meets the IEMA definition of a major accident.

Given the nature of the Proposed Development and the application Site, significant effects in respect of major accidents or disasters are considered unlikely based on the information available.

## Summary

This Screening Opinion Request has provided an overview of the potential for likely significant environmental effects associated with the Proposed Development as required by Regulation 6 and based upon the information available. Taking into account the impact of mitigation, the technical experts providing input into this Screening Opinion Request have concluded that significant effects are unlikely in relation to a range of topics. Furthermore, this has taken into account the conclusions of studies undertaken for wider committed development, in particular the delivery of residential development to the north and other existing and approved projects. The assessment has therefore also considered the potential for any likely significant cumulative effects particularly in relation to landscape and heritage. It is the view of the technical assessments that the Proposed Development, does not result in any likely significant environmental effects either individually or cumulatively



taking into account proposed mitigation. As such it does not comprise EIA development, nonetheless, we would request confirmation of the Councils formal EIA screening opinion.

We trust the information provided within this EIA Screening Opinion Request is of assistance, however please do contact me if you require any further information or have any queries regarding the content.

Yours sincerely



**Martin Bonner** BA (Hons) MSc MRTPI  
Associate Director

Enclosures.

- Appendix 1- Site Location Plan
- Appendix 2- EIA parameter layout plan
- Appendix 3 – Committed Development Locations
- Appendix 4 – Bat Detector Surveys
- Appendix 5 – Breeding Bird Characterisation Survey
- Appendix 6- Ecology Study References
- Appendix 7- TGP Methodology and Landscape Strategy Plan.
- Appendix 8- Nutrient Budget Report – Byrne Looby

#### Appendix 4 – Bat Detector Surveys

**Table A1:** Results of static detector survey at Location 1 (May 2021)

Species	Number of Bat Passes Recorded					
	12/05/21	13/05/21	14/05/21	15/05/21	16/05/21	Total
Common pipistrelle	8	5	5	0	14	32
Soprano pipistrelle	1	1	0	0	30	32

**Table A2:** Results of static detector survey at Location 1 (June 2021)

Species	Number of Bat Passes Recorded					
	23/06/21	24/06/21	25/06/21	26/06/21	27/06/21	Total
Common Pipistrelle	1	0	0	0	3	4

**Table A3:** Results of static detector survey at Location 1 (July 2021)

Species	Number of Bat Passes Recorded					
	16/07/21	17/07/21	18/07/21	19/07/21	20/07/21	Total
Common Pipistrelle	3	5	2	0	2	12
Soprano Pipistrelle	1	2	6	1	18	28

**Table A4:** Results of static detector survey at Location 1 (August 2021)

Species	Number of Bat Passes Recorded					
	09/08/21	10/08/21	11/08/21	12/08/21	13/08/21	Total
Common Pipistrelle	2	10	73	4	70	159
Soprano Pipistrelle	1	3	0	6	0	10
Noctule	1	0	0	0	0	1
Myotis	0	0	1	0	0	1

**Table A5:** Results of static detector survey at Location 1 (September 2021)

Species	Number of Bat Passes Recorded					
	13/09/21	14/09/21	15/09/21	16/09/21	17/09/21	Total
Common Pipistrelle	12	16	23	19	12	82
Soprano Pipistrelle	19	19	18	27	8	91
Myotis	1	2	2	5	1	11

**Table A6:** Results of static detector survey at Location 2 (May 2021)

Species	Number of Bat Passes Recorded					
	12/05/21	13/05/21	14/05/21	15/05/21	16/05/21	Total
Common Pipistrelle	2	1	0	0	2	5
Soprano Pipistrelle	2	0	0	1	10	13
Myotis	0	0	1	0	0	1

**Table A7:** Results of static detector survey at Location 2 (June 2021)

Species	Number of Bat Passes Recorded					
	23/06/21	24/06/21	25/06/21	26/06/21	27/06/21	Total

Common Pipistrelle	0	0	0	0	1	1
Soprano Pipistrelle	0	0	0	0	4	4

**Table A8:** Results of static detector survey at Location 2 (July 2021)

Species	Number of Bat Passes Recorded					
	17/07/21	18/07/21	19/07/21	20/07/21	21/07/21	Total
Common Pipistrelle	1	2	0	1	0	4
Soprano Pipistrelle	0	4	0	0	0	10

**Table A9:** Results of static detector survey at Location 2 (August 2021)

Species	Number of Bat Passes Recorded					
	09/08/21	10/08/21	11/08/21	12/08/21	13/08/21	Total
Common Pipistrelle	4	1	0	1	3	9
Soprano Pipistrelle	1	19	1	4	0	25
Noctule	0	0	1	0	0	1

**Table A10:** Results of static detector survey at Location 2 (September 2021)

Species	Number of Bat Passes Recorded					
	13/09/21	14/09/21	15/09/21	16/09/21	17/09/21	Total
Common Pipistrelle	1	3	0	2	4	10
Soprano Pipistrelle	7	18	25	11	17	78
Myotis	1	15	2	0	3	21

## Appendix 5 – Breeding Bird Characterisation Survey

**Table A11:** Summary results of breeding bird characterisation survey (\*numbers of breeding pairs within the Site or outside the Site but with a territory that is likely to include the Site)

Common Name	Species Name	Conservation status*	Estimated Breeding Pairs*	Comments / within or outside the Site
Blackbird	<i>Turdus merula</i>	Green	13	Nesting in boundary hedgerows and woodland within/adjacent to Site
Blackcap	<i>Sylvia atricapilla</i>	Green	1	Probably nesting in woodland outside the Site
Blue tit	<i>Cyanistes caeruleus</i>	Green	7	Nesting in boundary hedgerows and woodland within/adjacent to Site
Carrion crow	<i>Corvus corone</i>	Green	-	Probably nesting in woodland outside the Site
Chaffinch	<i>Fringilla coelebs</i>	Green	8	Nesting in boundary hedgerows and woodland within/adjacent to Site

Common Name	Species Name	Conservation status*	Estimated Breeding Pairs*	Comments / within or outside the Site
Chiffchaff	<i>Phylloscopus collybita</i>	Green	-	Probably nesting in woodland outside the Site
Coal tit	<i>Periparus ater</i>	Green	-	Probably nesting in woodland outside the Site
Common gull	<i>Larus canus</i>	Amber	-	n/a
Dunnock	<i>Prunella modularis</i>	Amber	2	Nesting in boundary hedgerows and woodland within/adjacent to Site
Garden warbler	<i>Sylvia borin</i>	Green	-	Probably nesting in woodland outside the Site
Goldcrest	<i>Regulus regulus</i>	Green	-	Probably nesting in woodland outside the Site
Goldfinch	<i>Carduelis carduelis</i>	Green	-	Probably nesting in woodland outside the Site
Great spotted woodpecker	<i>Dendrocopos major</i>	Green	-	Probably nesting in woodland outside the Site
Grey partridge	<i>Perdix perdix</i>	Red	-	n/a
Great tit	<i>Parus major</i>	Green	5	Nesting in boundary hedgerows adjacent to Site
House sparrow	<i>Passer domesticus</i>	Red	8	Nesting in boundary hedgerows adjacent to Site
Linnet	<i>Carduelis cannabina</i>	Red	-	n/a
Mistle thrush	<i>Turdus viscivorus</i>	Red	-	Probably nesting in woodland outside the Site
Pheasant	<i>Phasianus colchicus</i>	-	-	n/a
Pied wagtail	<i>Motacilla alba</i>	Green	-	n/a
Reed bunting	<i>Emberiza schoeniclus</i>	Amber	-	n/a
Robin	<i>Erithacus rubecula</i>	Green	3	
Skylark	<i>Alauda arvensis</i>	Red	-	Probably nesting in arable field to the west of the Site
Song thrush	<i>Turdus philomelos</i>	Amber	-	Probably nesting in woodland outside the Site
Sparrowhawk	<i>Accipiter nisus</i>	Amber	-	Probably nesting in woodland outside the Site
Starling	<i>Sturnus vulgaris</i>	Red	-	n/a

Common Name	Species Name	Conservation status*	Estimated Breeding Pairs*	Comments / within or outside the Site
Swallow	<i>Hirundo rustica</i>	Green	-	n/a
Tree sparrow	<i>Passer montanus</i>	Red	1	Probably nesting in northern boundary hedgerow
Whitethroat	<i>Sylvia communis</i>	Green	3	Nesting in boundary hedgerows adjacent to Site
Woodpigeon	<i>Columba palumbus</i>	Amber	-	Probably nesting in woodland outside the Site
Wren	<i>Troglodytes troglodytes</i>	Amber	5	Nesting in boundary hedgerows and woodland within/adjacent to Site
Yellowhammer	<i>Emberiza citrinella</i>	Red	-	Probably nesting in a hedgerow outside the Site to the north

\*Conservation status refers to the BoCC Red, Amber and Green Lists (Stanbury *et al*, 2021).

## Appendix 6- Ecology Study References

*Bat Tree Habitat Key (2018). Bat Roosts in Trees: A Guide to Identification and Assessment for Tree-Care and Ecology Professionals. Exeter, Pelagic Publishing.*

*Bat Conservation Trust & Institute of Lighting Professionals (2018). Bats and artificial lighting in the UK. Bats and the Built Environment series. Guidance Note 08/18.*

*Collins et al [Ed] (2016). Bat Surveys for Professional Ecologists: Good Practice Guidelines, 3rd Edition. Bat Conservation Trust, London.*

*Stanbury, A., Eaton, M., Aebischer, N., Balmer, D., Brown, A., Douse, A., Lindley, P., McCulloch, N., Noble, D., and Win I. (2021). The status of our bird populations: the fifth Birds of Conservation Concern in the United Kingdom, Channel Islands and Isle of Man and second IUCN Red List assessment of extinction risk for Great Britain. British Birds 114:723-747. Available online at <https://britishbirds.co.uk/content/status-our-bird-populations>.*

*Walsh, A.L. and Harris, S. (1996a). Foraging habitat preferences of vespertilionid bats in Britain. Journal of Applied Ecology, 33: 508-518.*

*Walsh, A.L. and Harris, S. (1996b). Factors determining the abundance of vespertilionid bats in Britain: geographical, land class and local habitat relationships. Journal of Applied Ecology, 33: 519-529.*