

From: Gill Thompson
Sent: 12 February 2015 14:00
To: DC Consultation
Subject: RE: Planning Application Consultation 15NP0005 Bulby's Wood Car Park, Ingram, Alnwick, Northumberland, NE66 4LT

Dear Chris,

This application is adjacent to the River Breamish which is part of the River Tweed SAC designated under the Habitats Directive and therefore the Habitats Regulations apply to the site. As the Local Planning Authority, Northumberland National Park Authority (as the competent authority) has to determine if an Appropriate Assessment is required. The Regulations require that, where an authority concludes that a development proposal unconnected with the nature conservation management of the SAC is likely to have a significant effect on that site, it must undertake an Appropriate Assessment of the implications for the interest features for which the area has been designated. The competent authority can only agree to a proposal after having determined that it will not adversely affect the integrity of the site.

After making a screening assessment of the proposed changes to the toilet block it is my opinion that although the project is not directly connected with the conservation management of the site it is **unlikely** that the proposals would have a **significant effect** on the features of the designated site. **A full Appropriate Assessment is therefore not required and I have no objections to the proposals.** I have come to these conclusions for the following reasons:

The proposals are to refurbish the existing toilet block to replace 7 toilets and a urinal trough with 4 toilets and 2 urinals. The existing manually filled holding tank will be replaced with a borehole to supply the water for the toilet facilities. Currently water is abstracted directly from the river manually to fill a tank (previously this was via a hydraulic ram) the new arrangements will abstract from a borehole. The proposed new borehole will abstract water from alluvium which does supply water to the base flow of river. Information supplied with the application shows that the volume estimated to be used is a very small percentage of the river baseflow (either total or from groundwater). There are no new wastewater treatments proposed - wastewater is currently dealt with via a Klargester and a soakaway effectively returning all the water volume to the river. This will remain unchanged.

The Natura 2000 site with potential to be affected by the proposal is the River Tweed SAC. No other European sites have the potential to be affected. From the JNCC website the listed features of interest for the whole SAC are:

Annex I habitats that are a primary reason for selection of this site

Water courses of plain to montane levels with the *Ranunculus fluitantis* and *Callitriche-Batrachion* vegetation

The Tweed represents sub-type 2 in the north-eastern part of its range. It is the most species-rich example, by far, of a river with *Ranunculus* in Scotland, and is the only site selected for this habitat in Scotland. The river has a high ecological diversity which reflects the mixed geology of the catchment. Stream water-crowfoot *Ranunculus penicillatus* ssp. *pseudofluitans*, a species of southern rivers and streams, here occurs at its most northerly location as does fan-leaved water-crowfoot *R. circinatus*, along with river water-crowfoot *R. fluitans*, common water-crowfoot *R. aquatilis*, pond water-crowfoot *R. peltatus* and a range of hybrids. The Tweed is also the most northerly site for flowering-rush *Butomus umbellatus*.

Annex II species that are a primary reason for selection of this site

Atlantic salmon (*Salmo salar*)

The River Tweed supports a very large, high-quality salmon *Salmo salar* population in a river which drains a large catchment on the east coast of the UK, with sub-catchments in both Scotland and England. The Tweed is the best example in Britain of a large river showing a strong nutrient gradient along its length, with oligotrophic conditions in its headwaters, and nutrient-rich lowland conditions just before it enters the sea at Berwick. The high proportion of the River Tweed accessible to salmon, and the variety of habitat conditions in the river, has resulted in the Scottish section of the river supporting the full range of

salmon life-history types, with sub-populations of spring, summer salmon and grilse all being present. The extensive system supports a significant proportion of the Scottish salmon resource. In recent years, the salmon catch in the River Tweed is the highest in Scotland, with up to 15% of all salmon caught. Considerable work has been done by the Scottish Environment Protection Agency (and previously the Tweed River Purification Board) and the River Tweed Foundation in tackling pollution and easing the passage of salmon past artificial barriers in the river. This has reversed many of the river's historical problems with water quality and access for salmon.

Otter (*Lutra lutra*)

This large river system contains extensive water and riparian habitat suitable for otters *Lutra lutra*. The extensive tributary burns provide good feeding habitat. The area provides extensive suitable habitat for all the necessary aspects of otter's life cycle and the site is a good representative of the south-east lowlands of Scotland and the north-east of England.

Annex II species present as a qualifying feature, but not a primary reason for site selection

Sea lamprey (*Petromyzon marinus*). Not relevant for this part of the SAC

Brook lamprey (*Lampetra planeri*)

River lamprey (*Lampetra fluviatilis*)

The potential impacts on the river and features of interest are identified as pollution, sedimentation, acidification and eutrophication, bankside management, genetic pollution and disease, abstraction and impoundment management. Of these, pollution, eutrophication and abstraction are the potential relevant issues for this proposal. The current status of this unit of the river is unfavourable recovering. There are no indications that pollution or eutrophication are current issues and since the waste water treatment will not change, these issues can be screened out. Regarding abstraction, as mentioned previously, surface water abstraction already takes place and it is estimated that with fewer facilities, more modern water efficient systems and groundwater abstraction there will be less impact on the river base flows by implementing the proposals than the current situation. The calculations provided on usage in the Hydrology report show that the maximum daily water usage will be a very low percentage of the base river flow even in summer. In addition the water is effectively returned to the system at the same point via the soakaway so total impacts on the river level will be negligible. Since water is to be abstracted from the groundwater borehole, which although is linked hydraulically to the river, data provided shows only some of this would eventually enter the river so the effect of abstracting water from the borehole is likely to be even lower on base flow than the current surface abstraction. In addition, water abstracted from a borehole will have no issues of collecting invertebrates and young fish, a potential problem with surface abstraction.

The thinning and crown reduction of the trees and shrubs around the toilet block proposed in the application is minimal and is not likely to have any effect on the designated features. There is not likely to be any sedimentation as the blocks of trees and wooded area will remain mainly the same and soil will be retained on site as existing. None of the felling is proposed close to the river bank.

In combination effects of other projects are not considered to alter the opinion. The study information indicates that there are no licensed water abstractions within 9 km which may increase removal of water from the base flow of the river. There are no known plans or projects in the planning system or other formal applications under regulatory proposals that could affect the site (unless current consultation with Environment Agency or Natural England reveal otherwise). Known proposals (pre-planning application stage) for bridge and river works on another tributary are not considered likely to have any effect in combination on the salmon, lamprey, otters or vegetation on this stretch of the river (Breamish) even though they are within the same SAC.

I feel that the above comments and conclusions have been made pragmatically for what I consider to be an improvement on an existing system which is likely to have little effect on the overall flow and condition of the designated site and no significant effect on the designated features.

I would however like to include the following conditions if permission is granted:

1. That the Klargestar is cleaned out at least once per year. This is to ensure proper operation of the system and prevent pollution incidents from overflow.
2. To use Phosphate-free detergents in the toilet block. This is to ensure that small amounts of phosphate do not enter the river despite the soakaway system since the existing soakaway is reasonably close to the river edge.

If you have any queries about any of these matters, please contact me.

Yours sincerely,

Gill Thompson

-----Original Message-----

From: DC Consultation

Sent: 29 January 2015 12:04

To: Gill Thompson

Subject: Planning Application Consultation 15NP0005 Bulby's Wood Car Park, Ingram, Alnwick, Northumberland, NE66 4LT

Please see the attached consultation regarding a planning application which has been received by Northumberland National Park Authority. Full details can be viewed at <http://nnpa.planning-register.co.uk/plaPlanningAppDisplay.aspx?AppNo=15NP0005>

[AppNo=15NP0005](http://nnpa.planning-register.co.uk/plaPlanningAppDisplay.aspx?AppNo=15NP0005)

DC Consultation, Development Control Consultation

Tel: (x)

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Gill Thompson, Ecologist

Tel: [REDACTED]

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