

Lisa Clark
Planning Officer
Newcastle City Council
Civic Centre
Newcastle upon Tyne, NE1 8PD

4th February 2015

Dear Lisa

Woolsington Hall: 2014/1925/01/DET & 2014/1926/01/LBC

I am writing to **object** to the above planning application. In broad terms we do not object to the restoration and conversion of the hall into a hotel and can accept that golf courses, if planned and managed with nature in mind, can be sufficiently beneficial for wildlife to mitigate for damage caused to biodiversity by creating them. However we do have a major objection to the construction of 72 houses and the Eastern and Western Woodland Lodges and associated car parking which will result in significant damage to mature woodland which is designated as a Site of Local Conservation Importance, wildlife corridor and contains protected species and veteran trees.

It is perverse that the developer's proposal involves damaging environmental heritage in order to fund the preservation of built heritage. We object to the development on the following grounds:

1. Development in the Greenbelt contrary to the NPPF and the Core Strategy. The Core Strategy has already identified sufficient land in Newcastle to meet projected housing and commercial need. Any built heritage benefits of the development will be negated by the damage to environmental and landscape heritage and therefore do not result in a significant overall benefit for the greater public good that would justify inappropriate development in the Greenbelt.
2. The 72 houses would involve significant direct damage to a mature woodland that is designated as a Site of Conservation Interest and a wildlife corridor, this will include the loss of 4.8 ha of mature woodland and cutting down 1,077 trees. There would also be indirect impact caused by disturbance to wildlife from people, pets (particularly predation by cats which will affect small mammal and bird populations in the SLCI), lighting and traffic. It is not possible to replace mature woodland, which takes over 100 years to establish, and therefore the planting of new trees to mitigate for the damage caused is not sufficient. As a result the application is contrary to local and national planning policy guidance on biodiversity (no net biodiversity loss) and should be refused. In particular in directing development away from sites that are important for wildlife.

3. The application does not have any financial information to demonstrate that any enabling development is required or the extent of the development. For example we understand that this was originally proposed as a much smaller housing scheme. We believe that the planning application can not be determined until such information is supplied by the developer and allowed public scrutiny.

4. We would disagree with the applicants assessment that the ecological impacts are minor or negligible and that damage caused to loss of mature woodland is appropriately mitigated by new planting and woodland management – a much more significant biodiversity mitigation package would be required to adequately mitigate, probably off-site given the historic landscape around the hall. Indeed the proposed planting on the golf course will damage the historic park setting. We are also concerned that the new tree planting will be spread around the margins of the estate. The damage to Woosington Woods SLCI is to a woodland block, and large blocks of woodland are different in character to more linear features, supporting slightly different species, particularly invertebrates (which were not surveyed as part of the EIA). This is another reason why we do not believe that the mitigation proposed for the damage to Woosington Woods SLCI is adequate and therefore would result in an overall net biodiversity loss, contrary to the NPPF.

5. The “significance of effect matrix” approach used in the ecological report is generally no longer applied in Ecological Impact Assessments for ES chapters. The Guidelines for Ecological Impact Assessment in the United Kingdom (section 4.52 to 4.54) outlines why this approach is now no longer considered good practice and hasn’t been since the guidelines were introduced in 2006. We would therefore question the validity of the ecological conclusions drawn from the EIA regarding the ecological impacts of the proposed development.

6. The EIA seems to make no mention of the fact that Woosington Woods SLCI is shown as a wildlife corridor on the Councils maps of wildlife corridors.

7. The ecological survey states that “There are no recent records of red squirrel within the local area” however they were recorded at Havannah Nature Reserve in the summer of 2014. This is approx 1 mile from woodland on the Woosington Hall estate. We believe that Red Squirrels are present in the general area and that they are likely to be present on site at certain times of year when food is present, eg for Beech mast. As part of the Woodland Management Plan we would expect to see a commitment to Red Squirrel conservation on the site (eg control of Grey Squirrels and education initiatives for households in the enabling development and hotel guests).

8. Enabling development requires that the benefits are for the greater public good; however the developer fails to explain what public good results from an exclusive hotel/spa/golf resort which will only be used by a relatively small number of wealthy individuals. Yes the Hall may be restored but this will not be open to the public as a historic building for them to visit and appreciate. We do not believe that the end use can be justified as being for the greater public good and thus the enabling development does not meet the criteria for this. This would be grounds for refusal.

9. There are already three hotels next to Newcastle Airport and there is surplus hotel capacity in Newcastle. There are already three golf courses within two kilometres of the site. Nationally, many golf courses are struggling with declining membership and some

are going out of business – in these circumstances it can not be argued that there is demand for another golf course in this location. There are already several other hotel/golf course ventures in the region (eg Slayey Woods, Close House, Matfen Hall, Linden Hall, etc) and no evidence that further are required. It seems likely that if this venture goes ahead any economic benefits that could accrue will be at the expense of other ventures meaning that there would be no overall net economic benefit to the region.

We trust that you will consider our response and act accordingly.

Yours sincerely

A handwritten signature in black ink, appearing to read 'James Littlewood', written in a cursive style.

James Littlewood
Director