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Your ref: 4/21/2432/0F1.



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**BY EMAIL ONLY**

Dear Oli,

Thank you for your consultation on the above dated and received by Natural England on 29 October 2021.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Our remit includes protected sites and landscapes, biodiversity, geodiversity, soils, protected species, landscape character, green infrastructure and access to and enjoyment of nature.

This application is adjacent to the St Bees SSSI, the proposed St Bees Heritage Coast Extension and the Cumbria Coast Marine Conservation Zone.

**Extended Phase 1 Habitat Survey**

The report from BSG Ecology is over 4 years old and needs to be updated. Natural England recommend the following surveys are carried out for both phases of development:

- An updated habitat survey (crucial for biodiversity net gain calculations)
- A Breeding bird survey, to include birds from the St Bees SSSI and the Solway Firth SPA.
- A Reptile Survey

**Landscape Visual Impact Assessment**

Natural England do not agree with the conclusions reached in the LVIA, the merging of the two phases of developments has allowed the assessment to under-estimate the impacts to the Heritage Coast. As the section of the coast adjacent to the Phase 1 development is classified as a potential Heritage Coast extension it should be classified as high value land. Further information is needed to assess each of the Phases of development impacts on the heritage coast and the proposed heritage coast. We have provided specific comments on the LVIA below:

5.37: The medium to low landscape value is the combined value of the two phases of land. Kells Farmland is high value land.

7.7: The assessment of effects on the Coastal Sandstone Landscape Character Type (LCT 4) is not correct as the development extends past the Wagon Way and therefore further west than the existing development settlement edge.

7.10: Due to the development in phase one developing a significant proportion of undeveloped land the conclusion drawn as moderate-slight and negative effects are inappropriate, the impacts of this development are dramatic and severe.

7.15: Natural England do not agree that the boundary could be moved further to the west in landscape and visual terms.

7.16: The break in slope mentioned here will not mitigate the phase one development.

Table 5: The assessment should reflect the comments listed above as Phase one development will have severe impacts. PROW 422008 is currently missing assessment information.

8.3: The impacted views will not be limited to the roof tops as the slope is not steep enough to hide the phase one development. Viewpoint 4 sets out the expected view looking in land from the English Coast Path, with full houses clearly visible.

### **Cumbria Coast Marine Conservation Zone**

The MCZ needs to be assessed for impacts from the development, particularly from surface water run off from phase two. Evidence needs to be provided and assessed to determine whether there would be any risk of increasing contamination levels within the MCZ. Particularly, to examine whether development will exacerbate the current volume of run-off and identify whether the fault is still contaminated.

**Natural England agree with the Environment Agency's request for a Remediation Strategy for the development of Phase 2.**

### **English Coast Path**

Natural England recommend contacting Cumbria County Council's Countryside Access team if the development or its construction processes will affect the path or its quality at any time.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries relating to specific advice in this letter only, please contact Niamh Keddy at [Niamh.Keddy@naturalengland.org.uk](mailto:Niamh.Keddy@naturalengland.org.uk). For any new consultations, or to provide further information on this consultation please send your correspondences to [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

Yours sincerely,  
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