

Consultee Comments for Planning Application DC/20/05763

Application Summary

Application Number: DC/20/05763

Address: Land At Ling Road Palgrave Suffolk

Proposal: Planning Application - Use of land for the siting of 4no. 'Off-Grid' Holiday Units and Erection of replacement Stores/Housekeeping building; Installation of PV Panels, Upgrading of existing Access and Track; New low-impact Parking Area and Foul Drainage

Case Officer: Daniel Cameron

Consultee Details

Name: Mrs Jane Wright

Address: Low Farm, Rectory Road, Wortham Diss, Suffolk IP22 1SL

Email: Not Available

On Behalf Of: Wortham And Burgate Parish Clerk

Comments

Wortham & Burgate Parish Council maintain our objection to this application, in support of Palgrave Parish Council

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Case Officer: Daniel Cameron

Consultee Details

Name: Mrs Jane Wright

Address: Low Farm, Rectory Road, Wortham Diss, Suffolk IP22 1SL

Email: Not Available

On Behalf Of: Wortham And Burgate Parish Clerk

Comments

Wortham and Burgate Parish Council OBJECT to this planning application.

The proposed development is in the fragile ecosystem and will encroach on long-standing wildlife habitats and pathways of protected species, in particular the roosts and hunting areas of barn owls.

Wortham and Burgate Parish Council requests that this contentious application is referred to the District Council Planning Committee for their consideration and deliberation.

Consultation on Resubmission of Planning Application 20/ 05763 - Land at Ling Road, Palgrave

To: planningyellow@baberghmidsuffolk.gov.uk,

Cc: Cllr David Burn <David.Burn@midsuffolk.gov.uk>

Please find below Palgrave Parish Council's reviewed response to the consultation re the above Planning Application which is for the same piece of land as application no. 2682/15- Land at Ling Road. This application was finally withdrawn. The resubmission is a result of revised site layout and landscaping report received 16 April 2021.

Palgrave Parish Council at its meeting of both 11 March 2021 and 4 May 2021 unanimously RESOLVED to OBJECT to the application on the same basis of our original objection in 2015. We understand this is going to the District Council's Planning Committee sometime in June 2021 for full debate.

The site layout has changed from the original application but the negative impact of the overall development remains unaltered. Specifically:

1. Development contrary to planning guidelines:

The proposed development is outside the settlement boundaries of Palgrave, Diss and Roydon.

2. Development in a Special Landscape Area:

The Mid Suffolk Local Plan defines the entire length of the river valley within its boundary, including the application site, as a Special Landscape Area¹(SLA). The proposed development unnecessarily impacts on this SLA. Policy CL2 requires any development to be "sensitively designed ², with high standards of layout, materials and landscaping.", which this is not (see 3 below).

3. Lack of design quality:

This application does not specify any design quality for the wooden cabins and entails the potential for a development of ugly caravan style structures.

4. Inappropriate greenfield development in an environmentally sensitive location

The proposed development is in a completely unspoiled and environmentally sensitive greenfield rural location and would set a dangerous precedent for development along the Waveney, adjacent to Wortham Ling SSSI and Roydon Fen Nature Reserve.

It is immediately adjacent to the 1066 Common Land identified as a Heritage Asset in the draft Diss and District Neighbourhood Plan, which >80% of local survey respondents consider important³. There are also a number of sites of Ancient Monuments, one of which is adjacent to the application site.

Immediately to the north of the site is Roydon Fen, a Local Nature Reserve, comprising restored wetland fen with extensive rare fen species. It is generally wet with the spring-fed, deep peat soils permanently water-logged. [Groundwater springs are a feature of this area, even on high ground where there several spring-fed ponds in Palgrave village.] The site is owned by South Norfolk DC and managed by the Suffolk Wildlife Trust.

To the immediate west of the site is Wortham Ling, an SSSI, and an expanse of heathland sustaining a variety of habitats and species. Horses cannot be ridden across it, and cyclists are not allowed (we note this proposal includes cycle storage clearly intended to encourage tourist cycling, which is illegal and would damage Wortham Ling).

To the west, upstream, is Redgrave and Lopham Fen, a National Nature Reserve, SSSI, RAMSAR and Natura 2000 site and the largest remaining river valley fen in England, owned and managed by Suffolk Wildlife Trust.

¹ [Local-Sites.jpg \(2479x1753\) \(suffolk.gov.uk\)](http://Local-Sites.jpg%20(2479x1753).suffolk.gov.uk)

² [MSDC Website Local Plan \(midsuffolk.gov.uk\)](http://MSDC%20Website%20Local%20Plan.midsuffolk.gov.uk)

³ [Issues & Options Consultation \(1\) Results Report Palgrave \(filesusr.com\)](http://Issues%20&%20Options%20Consultation%20(1)%20Results%20Report%20Palgrave.filesusr.com)

The development of this site would also sever the wildlife corridor which connects Wortham Ling with the water meadows south of Roydon, and which is bounded by the Waveney to the North and Ling Road to the South. This contravenes Local Plan Policy CL10: “development adjacent to rivers...will be expected to conserve and enhance existing wildlife, landscape and archaeological features”.

5. Direct environmental damage: Air pollution and Impact on Wortham Ling SSSI;

Air pollution: It is important to recognise that the “off grid” label applied by the developer does NOT mean a lower environmental impact. In fact, this development proposes to use wood for cooking, heating and in a fire pit. This will mean a **very high level of local air pollution** emitted throughout the day, made especially high by short term fire raising for meals by inexperienced users leading to low combustion temperatures and excessive smoke. **These emissions are likely to be higher than for an entire development of conventional housing**, and particularly feature the very harmful PM2.5 particulate matter which (according to the British Medical Journal) are estimated to have caused 37,800 premature deaths pa in the UK, with wood burning contributing 2.4x as much as road traffic.⁴ The site is directly upwind of and close to the populations of Diss and Roydon.

In addition, unless a significant investment in battery storage is made by the developer, there is the additional potential for **noise** and air pollution from diesel generator(s), as solar PV alone cannot provide 24h power. It is likely that tourist dissatisfaction with a small battery /solar only solution (eg inability to use hairdryers) could provoke the developer down the line to install a generator, even if this is not planned at present.

SSSI damage :The proposed development is less than 100m from Wortham Ling, a Site of Special Scientific Interest. The development will add light pollution and potential river pollution, and is clearly intended (with cycle storage specified) to encourage cycling, which is forbidden on Wortham Ling to avoid SSSI damage, but hard to enforce. As the Mid-Suffolk local plan notes, SSSIs “can be seriously damaged by development outside their boundaries” (2.4.17).

6. Lack of Highways safety compliance

The Highways Visibility Plan for the proposed development states a Visibility Splay of 90m, while the Highways response to application requires compliance with DM1 for the access. We note that Ling Road has a speed limit of 60mph and we understand from SCC planning document DM01⁵ that a Visibility Splay of 215m is required under these circumstances. The proposed development is therefore unsafe and non-compliant from a road safety perspective. Any increase to visibility would be likely to entail excessive hedgerow destruction.

7. Flooding

The River Waveney is liable to flooding and whilst the proposed units have been repositioned from the original 2015 application, their own site layout plan clearly shows units 3 and 4 as being particularly close to the flood plain, being nearer the main arm of the river. Units 1 and 2 are extremely close to the small branch that runs from the Waveney before re-joining it further along. The plan states the ‘area at potential risk of flooding under extreme weather events.’ In December 2020 we experienced the worst flooding for some years with the River Waveney bursting its banks along a huge stretch of the river including the area near Diss. It is a proven fact of climate change that our weather is becoming more extreme so the siting of a new holiday venue on this area prone to flooding is questionable.

⁴ <https://www.bmj.com/content/350/bmj.h2757/rr-1>

⁵ www.suffolk.gov.uk/assets/planning-waste-and-environment/planning-and-development-advice/Standard-Drawings-for-Vehicular-Access/DM01-B-SCC-SCD.pdf

Consultation on Planning Application 20/ 05763 - Land at Ling Road, Palgrave

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Cc: Cllr David Burn <David.Burn@midsuffolk.gov.uk>

Please find below Palgrave Parish Council's response to the consultation re the above Planning Application which is for the same piece of land as application no. 2682/15- Land at Ling Road. This application was finally withdrawn.

Palgrave Parish Council at its meeting of 11 March 2021 unanimously RESOLVED to OBJECT to this new application on the same basis of our original objection in 2015. As we did in 2015, we request once again that this be put before elected members of the planning committee for their consideration.

The site layout has changed from the original application but the negative impact of the overall development remains unaltered. Specifically:

1. Development contrary to planning guidelines:

The proposed development is outside the settlement boundaries of Palgrave, Diss and Roydon.

2. Development in a Special Landscape Area:

The Mid Suffolk Local Plan defines the entire length of the river valley within its boundary, including the application site, as a Special Landscape Area¹(SLA). The proposed development unnecessarily impacts on this SLA. Policy CL2 requires any development to be "sensitively designed², with high standards of layout, materials and landscaping.", which this is not (see 3 below).

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In addition, unless a significant investment in battery storage is made by the developer, there is the additional potential for **noise** and air pollution from diesel generator(s), as solar PV alone cannot provide 24h power. It is likely that tourist dissatisfaction with a small battery /solar only solution (eg inability to use hairdryers) could provoke the developer down the line to install a generator, even if this is not planned at present.

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⁵ www.suffolk.gov.uk/assets/planning-waste-and-environment/planning-and-development-advice/Standard-Drawings-for-Vehicular-Access/DM01-B-SCC-SCD.pdf

The Parish Council are disappointed that they were not included in the list of consultees for this planning application in view of the proximity to the parish boundary and the affect this proposal may have on the landscapes and residents of our parish. The county boundary should not be a restraint to proper consultation with affected parties.

A full and detailed response has been hampered by the time constraints due to the lack of notification. Roydon Parish Council fully endorse the views put forward by Palgrave Parish Council.

In addition, Roydon Parish Council wish to highlight the following concerns specifically affecting our parish:

1. Environmental effects of development in this area.

Roydon Fen, adjacent to the proposed site, like all valley fens is incredibly wet most of the year with the spring-fed, deep peat soils permanently water-logged. This natural waterlogging supports a wide variety of species which rely on the surrounding environment to support them. Barn owls are known to use this area. The Waveney valley is made up of a series of natural habitats which are linked by environmental corridors, allowing one development may reduce the ability to stop further future developments causing permanent damage to this fragile eco-system. This disruption could result in a loss of species, many of which are in decline.

2. Flooding.

This area naturally floods, however, in recent years this has become more pronounced. Any type of development on areas of flood plain could result in worse flooding in other areas.

3. Fire Hazard.

The use of open fires, the plan specifically shows a fire pit, could be a danger and result in extensive damage to the area if usage is not carefully monitored. As this is a remote site with no apparent continual management on site the usage of the pit could be a hazard at times when the area is very dry and stray sparks could ignite. In addition to the environmental damage of a fire this could affect the air quality of local residents.

For these reasons Roydon Parish Council OBJECT to this planning application.

Date: 11 March 2021
Our ref: 345451
Your ref: DC/20/05763



Mid Suffolk District Council
planningyellow@babberghmidsuffolk.gov.uk

BY EMAIL ONLY

Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

Dear Daniel Cameron

Planning consultation: Planning Application - Use of land for the siting of 4no. 'Off-Grid' Holiday Units and Erection of replacement Stores/Housekeeping building; Installation of PV Panels, Upgrading of existing Access and Track; New low-impact Parking Area and Foul Drainage

Location: Land At, Ling Road, Palgrave, Suffolk

Thank you for your consultation on the above dated 02 March 2021 which was received by Natural England on 02 March 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.

SUMMARY OF NATURAL ENGLAND'S ADVICE

NO OBJECTION

Based on the plans submitted, Natural England considers that the proposed development will not have significant adverse impacts on statutorily protected nature conservation sites or landscapes.

Natural England's generic advice on other natural environment issues is set out at Annex A.

Sites of Special Scientific Interest

Based on the plans submitted, Natural England considers that the proposed development will not have likely significant effects on statutorily protected sites and has no objection to the proposed development.

Sites of Special Scientific Interest Impact Risk Zones

The Town and Country Planning (Development Management Procedure) (England) Order 2015 requires local planning authorities to consult Natural England on "Development in or likely to affect a Site of Special Scientific Interest" (Schedule 4, w). Our SSSI Impact Risk Zones are a GIS dataset designed to be used during the planning application validation process to help local planning authorities decide when to consult Natural England on developments likely to affect a SSSI. The dataset and user guidance can be accessed from the data.gov.uk website

Further general advice on the consideration of protected species and other natural environment issues is provided at Annex A.

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 regarding this letter, for new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Yours sincerely

Amy Knafler
Consultations Team

Annex - Generic advice on natural environment impacts and opportunities

Sites of Special Scientific Interest (SSSIs)

Local authorities have responsibilities for the conservation of SSSIs under s28G of the Wildlife & Countryside Act 1981 (as amended). The National Planning Policy Framework (paragraph 175c) states that development likely to have an adverse effect on SSSIs should not normally be permitted. Natural England's SSSI Impact Risk Zones are a GIS dataset designed to be used during the planning application validation process to help local planning authorities decide when to consult Natural England on developments likely to affect a SSSI. The dataset and user guidance can be accessed from the Natural England Open Data Geoportal.

Biodiversity duty

Your authority has a duty to have regard to conserving biodiversity as part of your decision making. Conserving biodiversity can also include restoration or enhancement to a population or habitat. Further information is available here.

Protected Species

Natural England has produced standing advice¹ to help planning authorities understand the impact of particular developments on protected species. We advise you to refer to this advice. Natural England will only provide bespoke advice on protected species where they form part of a SSSI or in exceptional circumstances.

Local sites and priority habitats and species

You should consider the impacts of the proposed development on any local wildlife or geodiversity sites, in line with paragraphs 171 and 174 of the NPPF and any relevant development plan policy. There may also be opportunities to enhance local sites and improve their connectivity. Natural England does not hold locally specific information on local sites and recommends further information is obtained from appropriate bodies such as the local records centre, wildlife trust, geoconservation groups or recording societies.

Priority habitats and Species are of particular importance for nature conservation and included in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest, on the Magic website or as Local Wildlife Sites. The list of priority habitats and species can be found here². Natural England does not routinely hold species data, such data should be collected when impacts on priority habitats or species are considered likely. Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land, further information including links to the open mosaic habitats inventory can be found here.

Ancient woodland, ancient and veteran trees

You should consider any impacts on ancient woodland and ancient and veteran trees in line with paragraph 175 of the NPPF. Natural England maintains the Ancient Woodland Inventory which can help identify ancient woodland. Natural England and the Forestry Commission have produced standing advice for planning authorities in relation to ancient woodland and ancient and veteran trees. It should be taken into account by planning authorities when determining relevant planning applications. Natural England will only provide bespoke advice on ancient woodland, ancient and veteran trees where they form part of a SSSI or in exceptional circumstances.

Protected landscapes

¹ <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

² <http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

For developments within or within the setting of a National Park or Area of Outstanding Natural Beauty (AONB), we advise you to apply national and local policies, together with local landscape expertise and information to determine the proposal. The National Planning Policy Framework (NPPF) (paragraph 172) provides the highest status of protection for the landscape and scenic beauty of National Parks and AONBs. It also sets out a 'major developments test' to determine whether major developments should be exceptionally be permitted within the designated landscape. We advise you to consult the relevant AONB Partnership or Conservation Board or relevant National Park landscape or other advisor who will have local knowledge and information to assist in the determination of the proposal. The statutory management plan and any local landscape character assessments may also provide valuable information.

Public bodies have a duty to have regard to the statutory purposes of designation in carrying out their functions (under (section 11 A(2) of the National Parks and Access to the Countryside Act 1949 (as amended) for National Parks and S85 of the Countryside and Rights of Way Act, 2000 for AONBs). The Planning Practice Guidance confirms that this duty also applies to proposals outside the designated area but impacting on its natural beauty.

Heritage Coasts are protected under paragraph 173 of the NPPF. Development should be consistent the special character of Heritage Coasts and the importance of its conservation.

Landscape

Paragraph 170 of the NPPF highlights the need to protect and enhance valued landscapes through the planning system. This application may present opportunities to protect and enhance locally valued landscapes, including any local landscape designations. You may want to consider whether any local landscape features or characteristics (such as ponds, woodland or dry stone walls) could be incorporated into the development in order to respect and enhance local landscape character and distinctiveness, in line with any local landscape character assessments. Where the impacts of development are likely to be significant, a Landscape & Visual Impact Assessment should be provided with the proposal to inform decision making. We refer you to the [Landscape Institute](#) Guidelines for Landscape and Visual Impact Assessment for further guidance.

Best and most versatile agricultural land and soils

Local planning authorities are responsible for ensuring that they have sufficient detailed agricultural land classification (ALC) information to apply NPPF policies (Paragraphs 170 and 171). This is the case regardless of whether the proposed development is sufficiently large to consult Natural England. Further information is contained in [GOV.UK guidance](#). Agricultural Land Classification information is available on the [Magic](#) website on the [Data.Gov.uk](#) website. If you consider the proposal has significant implications for further loss of 'best and most versatile' agricultural land, we would be pleased to discuss the matter further.

Guidance on soil protection is available in the Defra [*Construction Code of Practice for the Sustainable Use of Soils on Construction Sites*](#), and we recommend its use in the design and construction of development, including any planning conditions. Should the development proceed, we advise that the developer uses an appropriately experienced soil specialist to advise on, and supervise soil handling, including identifying when soils are dry enough to be handled and how to make the best use of soils on site.

Access and Recreation

Natural England encourages any proposal to incorporate measures to help improve people's access to the natural environment. Measures such as reinstating existing footpaths together with the creation of new footpaths and bridleways should be considered. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure. Relevant aspects of local authority green infrastructure strategies should be delivered where appropriate.

Rights of Way, Access land, Coastal access and National Trails

Paragraphs 98 and 170 of the NPPF highlights the important of public rights of way and access. Development should consider potential impacts on access land, common land, rights of way, coastal access routes and coastal margin in the vicinity of the development and the scope to mitigate any adverse impacts. Consideration should also be given to the potential impacts on any nearby National Trails, including the England Coast Path. The National Trails website www.nationaltrail.co.uk provides information including contact details for the National Trail Officer.

Environmental enhancement

Development provides opportunities to secure net gains for biodiversity and wider environmental gains, as outlined in the NPPF (paragraphs 8, 72, 102, 118, 170, 171, 174 and 175). We advise you to follow the mitigation hierarchy as set out in paragraph 175 of the NPPF and firstly consider what existing environmental features on and around the site can be retained or enhanced or what new features could be incorporated into the development proposal. Where onsite measures are not possible, you should consider off site measures. Opportunities for enhancement might include:

- Providing a new footpath through the new development to link into existing rights of way.
- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Designing lighting to encourage wildlife.
- Adding a green roof to new buildings.

You could also consider how the proposed development can contribute to the wider environment and help implement elements of any Landscape, Green Infrastructure or Biodiversity Strategy in place in your area. For example:

- Links to existing greenspace and/or opportunities to enhance and improve access.
 - Identifying opportunities for new greenspace and managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips)
 - Planting additional street trees.
 - Identifying any improvements to the existing public right of way network or using the opportunity of new development to extend the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition or clearing away an eyesore).



Mr Daniel Cameron
Mid Suffolk District Council
Planning Department
Endeavour House Russell Road
Ipswich
Suffolk
IP1 2BX

Our ref: AE/2021/125989/01-L02
Your ref: DC/20/05763
Date: 12 May 2021

Dear Mr Cameron

PLANNING APPLICATION - USE OF LAND FOR THE SITING OF 4NO. 'OFF-GRID' HOLIDAY UNITS AND ERECTION OF REPLACEMENT STORES/HOUSEKEEPING BUILDING; INSTALLATION OF PV PANELS, UPGRADING OF EXISTING ACCESS AND TRACK; NEW LOW-IMPACT PARKING AREA AND FOUL DRAINAGE

LAND AT LING ROAD PALGRAVE SUFFOLK

Please note that this letter is being issued to correct an error in our previous response, which incorrectly referenced the development being within range of a sewer network connection. Please refer to the Foul Drainage section for amendments to wording. The remainder of our comments remain valid and have being included for clarity as follows:

Thank you for your consultation dated 02 March 2021. We have inspected the application, as submitted, and have no objection to the proposal. We are including some informative advice on Environmental Permitting and Foul Drainage, as set out in the letter below.

Environmental Permitting

Flood Defence Consents now fall under the new Environmental Permitting (England and Wales) Regulations 2016 system (EPR). The applicant may need an environmental permit for flood risk activities if they want to do work in, under, over or within 8m of the river and of any flood defence structure or culvert of the River Waveney, designated a 'main river'.

The EPR are a risk-based framework that enables us to focus regulatory effort towards activities with highest flood or environmental risk. Lower risk activities will be excluded or exempt and only higher risk activities will require a permit. Your proposed works may fall under an either one or more of the below:

- 'Exemption,
- 'Exclusion',
- 'Standard Risks Permit'
- 'Bespoke permit.

New forms and further information can be found at: <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits>. Anyone carrying out these activities without a permit where one is required, is breaking the law.

Please contact our National Customer Contact Centre to assess which category your proposed works fall under. They will then be able to tell you the classification of your application, the fee associated with your application, and how to proceed forward. They can be contacted by email at: floodriskactivity@environment-agency.gov.uk

Foul Drainage

We note the application proposes the use of a cess pit to dispose of foul water and have the following advice in that regard:

A private means of foul effluent disposal is only acceptable when foul mains drainage is unavailable. According to our maps the proposed site and holiday units appear to be located outside of reasonable range for main sewer network connection, however, we wish to draw your attention as to why other private means of foul drainage, as listed in the hierarchy for foul effluent disposal, have been ruled out ahead of a proposed cesspit methodology without any clear evidence provided. The Planning Practice Guidance states that 'when drawing up wastewater treatment proposals for any development, the first presumption is to provide a system of foul drainage discharging into a public sewer to be treated at a public sewage treatment works... where a connection to a public sewage treatment plant is not feasible (in terms of cost and/or practicality) [a package sewage treatment](#) plant can be considered.' It then states that 'septic tanks should only be considered if it can be clearly demonstrated by the applicant that discharging into a public sewer to be treated at a public sewage treatment works or a package sewage treatment plant is not feasible (taking into account cost and/or practicability).'

You should ensure that clear justification is provided by the applicant as to why a cess pit is required, ie. why connection to the mains, a package treatment plant, or a septic tank is not possible/feasible. If you consider this justification to be satisfactory, the following will be relevant:

- A cesspool is a covered watertight tank used for storing sewage. It has no outlet and relies on road transport for the removal of raw sewage. It is the least sustainable option for sewage disposal. You should consider a cesspool as a temporary measure pending a more satisfactory solution.
- The minimum capacity of a cesspool is set in guidance supporting the Building Regulations. Please ensure that this is followed to prevent frequent emptying, an overflow or at worst, toilets and drains backing up.
- A cesspool requires regular emptying and must not be allowed to overflow. We recommend the applicant installs a level warning device to indicate when it is nearly full. Whoever empties your cesspool must be registered with us to carry waste. The local authority or a private contractor can be used as an emptying service (the applicant should check, as emptying services may be non-existent or expensive in their area).

- Additionally, the cesspool will need to be sited in an area that can be accessed by the necessary plant to empty the tank and where it cannot affect surface or ground waters and cannot cause a nuisance to nearby residential properties. The Building Regulations set minimum distances from certain features and the applicant should consult the local authority to ensure they locate their plant appropriately.

We trust that this advice is useful.

Yours sincerely

Mr Ed Abigail
Planning Advisor

Direct dial 0203 0254209

Direct e-mail Planning.lpswich@environment-agency.gov.uk

cc Roberts Molloy Associates

Your Ref:DC/20/05763
Our Ref: SCC/CON/0954/21
Date: 18 March 2021
Highways Enquiries to: Highways.DevelopmentControl@suffolk.gov.uk



All planning enquiries should be sent to the Local Planning Authority.

Email: planning@babberghmidsuffolk.gov.uk

The Planning Department
MidSuffolk District Council
Planning Section
1st Floor, Endeavour House
8 Russell Road
Ipswich
Suffolk
IP1 2BX

For the attention of: Daniel Cameron

Dear Daniel,

TOWN AND COUNTRY PLANNING ACT 1990

CONSULTATION RETURN: DC/20/05763

PROPOSAL: Planning Application - Use of land for the siting of 4no. 'Off-Grid' Holiday Units and Erection of replacement Stores/Housekeeping building; Installation of PV Panels, Upgrading of existing Access and Track; New low-impact Parking Area and Foul Drainage.

LOCATION: Land At Ling Road, Palgrave, Suffolk

Notice is hereby given that the County Council as Highway Authority recommends that any permission which that Planning Authority may give should include the conditions shown below:

Condition: The vehicular access shall be laid out and completed in all respects in accordance with Drawing No. DM01 and with an entrance width of 4.5m and made available for use prior to occupation.

Thereafter the access shall be retained in the specified form.

Reason: To ensure that the access is designed and constructed to an appropriate specification and made available for use at an appropriate time in the interests of highway safety.

Condition: Before the access is first used visibility splays shall be provided as shown on Drawing No. 05 with an X dimension of 2.4m and a Y dimension of 90m and thereafter retained in the specified form. Notwithstanding the provisions of Part 2 Class A of the Town & Country Planning (General Permitted Development) Order 1995 (or any Order revoking and re-enacting that Order with or without modification) no obstruction over 0.6 metres high shall be erected, constructed, planted or permitted to grow within the areas of the visibility splays.

Condition: Prior to the holiday units hereby permitted being first occupied, the vehicular access onto the highway shall be properly surfaced with a bound material for a minimum distance of 5 metres from the

edge of the metalled carriageway, in accordance with details previously submitted to and approved in writing by the local planning authority.

Reason: To secure appropriate improvements to the vehicular access in the interests of highway safety.

Condition: The vehicular access hereby permitted shall be a minimum width of 4.5 metres for a distance of 10 metres measured from the nearby edge of the carriageway.

Reason: To ensure vehicles can enter and leave the site in a safe manner.

Condition: The access driveway shall be constructed at a gradient not steeper than 1 in 8.

Reason: To ensure that vehicles can enter and leave the public highway in a safe manner.

Condition: The gradient of the vehicular access shall not be steeper than 1 in 20 for the first five metres measured from the nearside edge of the adjacent metalled carriageway.

Reason: To ensure that vehicles can enter and leave the public highway in a safe manner.

Condition: Before the development is occupied details of the areas to be provided for storage and presentation of Refuse/Recycling bins shall be submitted to and approved in writing by the Local Planning Authority.

The approved scheme shall be carried out in its entirety before the development is brought into use and shall be retained thereafter for no other purpose.

Reason: To ensure that refuse recycling bins are not stored on the highway causing obstruction and dangers for other users.

Condition: The use shall not commence until the area(s) within the site shown on Drawing No. 03B for the purposes of manoeuvring and parking of vehicles has been provided and thereafter that area(s) shall be retained and used for no other purposes.

Reason: To ensure that sufficient space for the on site parking of vehicles is provided and maintained in order to ensure the provision of adequate on-site space for the parking and manoeuvring of vehicles where on-street parking and manoeuvring would be detrimental to highway safety to users of the highway.

Condition: Before the development is commenced details of the areas to be provided for secure cycle storage shall be submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be carried out in its entirety before the development is brought into use and shall be retained thereafter and used for no other purpose.

Reason: To promote the use of sustainable travelling alternatives.

Note: It is an OFFENCE to carry out works within the public highway, which includes a Public Right of Way, without the permission of the Highway Authority. Any conditions which involve work within the limits of the public highway do not give the applicant permission to carry them out. These works will need to be applied for and agreed with Suffolk County Council as the Local Highway Authority. Application form for minor works licence under Section 278 of the Highways Act 1980 can be found at the following webpage:

www.suffolk.gov.uk/planning-waste-and-environment/planning-and-development-advice/

Yours sincerely,

Kyle Porter
Development Management Technician
Growth, Highways and Infrastructure

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

From: GHI Floods Planning

Sent: 22 April 2021 10:41

Subject: 2021-04-22 JS Reply Land At, Ling Road, Palgrave, Suffolk Ref DC/20/05763

Dear Daniel Cameron,

Subject: Land At, Ling Road, Palgrave, Suffolk Ref DC/20/05763

Please see the LLFA's previous consultation reply.

Kind Regards

Jason Skilton

Flood & Water Engineer

Suffolk County Council

Growth, Highway & Infrastructure

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

From: GHI Floods Planning

Sent: 04 March 2021 07:51

Subject: 2021-03-04 JS Reply Land At, Ling Road, Palgrave, Suffolk Ref DC/20/05763

Dear Daniel Cameron,

Thank you for your notification of planning application DC/20/05763 for the proposed development of Land At, Ling Road, Palgrave, Suffolk received on the 2ND March 2021.

Suffolk County Council, as Lead Local Flood Authority (LLFA), is a statutory consultee under the Town and Country Planning Act for major applications only.

Therefore, as this is a minor application we have no comment to make and we would point the LPA and the applicant towards the following guidance:-

Long Term Flood Risk - <https://flood-warning-information.service.gov.uk/long-term-flood-risk>

Flood risk assessment: standing advice - <https://www.gov.uk/guidance/flood-risk-assessment-standing-advice>

What is meant by "minor development" in relation to flood risk -

<https://www.gov.uk/guidance/flood-risk-and-coastal-change#minor-development-to-flood-risk>

The Local Planning Authority should be mindful that the application complies with national, local policy, best practise and guidance in relation to flood risk and surface water drainage.

Relevant Policies in relation to Flood Risk & SuDS

National Legislation/Codes

- National Planning Policy Framework
- Defra's Non-Statutory Technical Standards for SuDS
- Building Regulations: Approved Document H - Drainage and Waste Disposal (2015 edition)
- BS8582:2013 Code of Practice for Surface Water Management for Development Sites
- National Design Guide, Planning Practise Guidance for beautiful, enduring and successful places

Local Policy

- Suffolk Flood Risk Management Strategy and Appendices
- Mid Suffolk District Council (Policy CS 4 Adapting to Climate Change)

Kind Regards

Jason Skilton

Flood & Water Engineer

Suffolk County Council

Growth, Highways and Infrastructure
Bury Resource Centre
Hollow Road
Bury St Edmunds
Suffolk
IP32 7AY

Philip Isbell
Chief Planning Officer
Planning Services
Babergh and Mid Suffolk District Councils
Endeavour House
8 Russell Road
Ipswich IP1 2BX

Enquiries to: Dr Hannah Cutler
Direct Line: 01284 741229
Email: Hannah.Cutler@suffolk.gov.uk
Web: <http://www.suffolk.gov.uk>

Our Ref: 2020_05763
Date: 11/03/2021

For the Attention of Daniel Cameron

Dear Mr Isbell

Planning Application, DC/20/05763, Land At Ling Road Palgrave: Archaeology

This site lies in an area of archaeological potential recorded on the County Historic Environment Record, adjacent to Wortham Ling (WTM 040, 042, 038), where there are many recorded finds of Prehistoric flintwork and pottery. As a result, there is high potential for the discovery of below-ground heritage assets of archaeological importance within this area, and groundworks associated with the development have the potential to damage or destroy any archaeological remains which exist.

There are no grounds to consider refusal of permission in order to achieve preservation *in situ* of any important heritage assets. However, in accordance with the *National Planning Policy Framework* (Paragraph 199), any permission granted should be the subject of a planning condition to record and advance understanding of the significance of any heritage asset before it is damaged or destroyed.

In this case the following two conditions would be appropriate:

1. No development shall take place within the area indicated [the whole site] until the implementation of a programme of archaeological work has been secured, in accordance with a Written Scheme of Investigation which has been submitted to and approved in writing by the Local Planning Authority.

The scheme of investigation shall include an assessment of significance and research questions; and:

- a. The programme and methodology of site investigation and recording
- b. The programme for post investigation assessment
- c. Provision to be made for analysis of the site investigation and recording
- d. Provision to be made for publication and dissemination of the analysis and records of the

site investigation

e. Provision to be made for archive deposition of the analysis and records of the site investigation

f. Nomination of a competent person or persons/organisation to undertake the works set out within the Written Scheme of Investigation.

g. The site investigation shall be completed prior to development, or in such other phased arrangement, as agreed and approved in writing by the Local Planning Authority.

2. No building shall be occupied until the site investigation and post investigation assessment has been completed, submitted to and approved in writing by the Local Planning Authority, in accordance with the programme set out in the Written Scheme of Investigation approved under Condition 1 and the provision made for analysis, publication and dissemination of results and archive deposition.

REASON:

To safeguard archaeological assets within the approved development boundary from impacts relating to any groundworks associated with the development scheme and to ensure the proper and timely investigation, recording, reporting and presentation of archaeological assets affected by this development, in accordance with Core Strategy Objective SO 4 of Mid Suffolk District Council Core Strategy Development Plan Document (2008) and the National Planning Policy Framework (2019).

INFORMATIVE:

The submitted scheme of archaeological investigation shall be in accordance with a brief procured beforehand by the developer from Suffolk County Council Archaeological Service, Conservation Team.

I would be pleased to offer guidance on the archaeological work required and, in our role as advisor to Mid Suffolk District Council, the Conservation Team of SCC Archaeological Service will, on request of the applicant, provide a specification for the archaeological work required at this site. In this case continuous archaeological monitoring and recording will be required during all ground works relating to this development.

Further details on our advisory services and charges can be found on our website: <http://www.suffolk.gov.uk/archaeology/>

Please do get in touch if there is anything that you would like to discuss or you require any further information.

Yours sincerely,

Hannah Cutler

Archaeological Officer
Conservation Team



30 March 2021

Daniel Cameron
Mid Suffolk District Council
Endeavour House
8 Russell Road
Ipswich, IP1 2BX

By email only

Thank you for requesting advice on this application from Place Services' ecological advice service. This service provides advice to planning officers to inform Mid Suffolk District Council planning decisions with regard to potential ecological impacts from development. Any additional information, queries or comments on this advice that the applicant or other interested parties may have, must be directed to the Planning Officer who will seek further advice from us where appropriate and necessary.

Application: DC/20/05763
Location: Land At Ling Road Palgrave Suffolk
Proposal: Planning Application - Use of land for the siting of 4no. 'Off-Grid' Holiday Units and Erection of replacement Stores/Housekeeping building; Installation of PV Panels, Upgrading of existing Access and Track; New low-impact Parking Area and Foul Drainage

Dear Dan,

Thank you for consulting Place Services on the above application.

No objection subject to securing ecological mitigation and enhancement measures

Summary

We have reviewed the Preliminary Ecological Appraisal (Greenlight Environmental Consultancy, February 2021), provided by applicant, relating to the likely impacts of development on designated sites, protected & Priority species / habitats.

We are satisfied that there is sufficient ecological information available for determination. This provides certainty for the LPA of the likely impacts on designated sites, protected and Priority species & habitats and, with appropriate mitigation measures secured, the development can be made acceptable.

The mitigation measures identified in the Preliminary Ecological Appraisal (Greenlight Environmental Consultancy, February 2021) should be secured and implemented in full. This is necessary to conserve designated sites, protected and Priority species.

Therefore, we note that Wortham Ling Site of Special Scientific Interest (SSSI) is located immediately adjacent west of the site and designated for its lowland dry heath and acid grassland communities and



agree that the development will not directly result in adverse impact upon the designated features of the legally protected site. In addition, we note that Natural England have stated that they have no objection to the proposed development (March 2021, Ref: 345451). However, it is highlighted that lowland dry heath and acid grassland is particularly sensitive to increases in recreational disturbance and we note that operations likely to damage the special interest of the SSSI include *“Recreational or other activities likely to damage features of interest”*. Therefore, we recommend that the developer should provide leaflets to promote alternative recreational options within the local area and outline good practice recreational behaviours within Wortham Ling SSSI for the visitors of the holiday cabins. This could include correspondence with landowners and relevant stakeholders to ensure that effective advice is delivered to avoid adverse impacts from recreational disturbance upon the SSSI.

We also recommend that a Wildlife Friendly Lighting Strategy is implemented for this application. Therefore, technical specification should be secured as a condition of any consent, which demonstrates measures to avoid lighting impacts to foraging / commuting bats, which are likely present within the local area. This should summarise the following measures will be implemented:

- Light levels should be as low as possible as required to fulfil the lighting need.
- Warm White lights should be used at <2700k. This is necessary as lighting which emit an ultraviolet component or that have a blue spectral content have a high attraction effects on insects. This may lead in a reduction in prey availability for some light sensitive bat species.
- The provision of motion sensors or timers to avoid the amount of ‘lit-time’ of the proposed lighting.
- Lights should be designed to prevent horizontal spill e.g. cowls, hoods, reflector skirts or shields.

We also support the bespoke biodiversity enhancements outlined within the ecological assessment, which have been recommended to secure net gains for biodiversity, as outlined under Paragraph 170[d] & 175[d] of the National Planning Policy Framework 2019. Therefore, we recommend that these measures should be secured via a Biodiversity Enhancement Strategy to be secured as a condition of any consent. This should include native species planting, bird and bat boxes (including a standalone Barn Owl box) and a long term management plan for these features, which could be implemented over a 5 year period.

This will enable LPA to demonstrate its compliance with its statutory duties including its biodiversity duty under s40 NERC Act 2006.

Impacts will be minimised such that the proposal is acceptable subject to the conditions below based on BS42020:2013.

Submission for approval and implementation of the details below should be a condition of any planning consent.

Recommended conditions

1. ACTION REQUIRED IN ACCORDANCE WITH ECOLOGICAL APPRAISAL RECOMMENDATIONS

“All mitigation and enhancement measures and/or works shall be carried out in accordance with the details contained in the Preliminary Ecological Appraisal (Greenlight Environmental



Consultancy, February 2021) as already submitted with the planning application and agreed in principle with the local planning authority prior to determination.

This may include the appointment of an appropriately competent person e.g. an ecological clerk of works (ECoW,) to provide on-site ecological expertise during construction. The appointed person shall undertake all activities, and works shall be carried out, in accordance with the approved details.”

Reason: To conserve and enhance protected and Priority species and allow the LPA to discharge its duties under the Conservation of Habitats and Species Regulations 2017 (as amended), the Wildlife & Countryside Act 1981 as amended and s40 of the NERC Act 2006 (Priority habitats & species).

2. PRIOR TO BENEFICIARY USE: BIODIVERSITY ENHANCEMENT STRATEGY

“A Biodiversity Enhancement Strategy shall be submitted to and approved in writing by the local planning authority.

The content of the Biodiversity Enhancement Strategy shall include the following:

- a) Purpose and conservation objectives for the proposed enhancement measures;*
- b) detailed designs to achieve stated objectives;*
- c) locations of proposed enhancement measures by appropriate maps and plans;*
- d) persons responsible for implementing the enhancement measures;*
- e) details of initial aftercare and long-term maintenance of soft landscaping and bespoke enhancements*

The works shall be implemented in accordance with the approved details and shall be retained in that manner thereafter.”

Reason: To enhance Protected and Priority Species/habitats and allow the LPA to discharge its duties under the s40 of the NERC Act 2006 (Priority habitats & species).

3. PRIOR TO BENEFICIARY USE: WILDLIFE SENSITIVE LIGHTING DESIGN SCHEME

“A lighting design scheme for biodiversity shall be submitted to and approved in writing by the local planning authority. The scheme shall identify those features on site that are particularly sensitive for bats and that are likely to cause disturbance along important routes used for foraging; and show how and where external lighting will be installed so that it can be clearly demonstrated that areas to be lit will not disturb or prevent bats using their territory.

All external lighting shall be installed in accordance with the specifications and locations set out in the scheme and maintained thereafter in accordance with the scheme. Under no circumstances should any other external lighting be installed without prior consent from the local planning authority.”

Reason: To conserve protected and Priority species and allow the LPA to discharge its duties under the Conservation of Habitats and Species Regulations 2017 (as amended), the Wildlife & Countryside Act 1981 as amended and s40 of the NERC Act 2006 (Priority habitats & species).



4. PRIOR TO BENEFICIARY USE: DELIVERY OF VISITOR LEAFLET DESIGN TO AVOID ADVERSE IMPACT UPON WORTHAM LING SSSI

“To ensure that adverse impacts are not caused upon the adjacent Wortham Ling Site of Special Scientific Interest (SSSI), a leaflet design shall be submitted to, and be approved in writing by, the local planning authority prior to beneficiary use of the development. This shall provide alternative recreational options within the local area and outline good practice recreational behaviours within Wortham Ling SSSI.

The leaflets shall be implemented in accordance with the approved details and shall be provided to each visitor of the holiday cabins.”

Reason: To allow the LPA to discharge its duties under the Wildlife & Countryside Act 1981 (as amended).

Please contact us with any queries.

Yours sincerely,

Hamish Jackson ACIEEM BSc (Hons)
Ecological Consultant
placeservicesecology@essex.gov.uk

Place Services provide ecological advice on behalf of Mid Suffolk District Council

Please note: This letter is advisory and should only be considered as the opinion formed by specialist staff in relation to this particular matter.

Place Services
Essex County Council
County Hall, Chelmsford
Essex, CM1 1QH
T: 0333 013 6840
www.placeservices.co.uk
[@PlaceServices](https://twitter.com/PlaceServices)



Planning Services
Mid Suffolk District Council
Endeavour House
8 Russell Road
Ipswich
IP1 2BX

30/04/2021

For the attention of: Daniel Cameron

Ref: DC/20/05768; Land at Ling Road, Palgrave, Suffolk

Thank you for re-consulting us on the Submission of details for the above application.

Since we were last consulted, the applicant has submitted revised a Site Layout Plan (Drawing Ref 03D) and document (Landscape & Visual Appraisal). While extra information has been supplied the level of detail is not substantial enough for us to fully make comment as the request for a schedule of proposed tree works is still outstanding.

Therefore, if minded for approval, we would recommend the following conditions be taken into consideration.

ACTION REQUIRED PRIOR TO COMMENCEMENT OF DEVELOPMENT: LANDSCAPE MANAGEMENT PLAN.

No development shall take place until there has been submitted to and approved, in writing, by the Local Planning Authority a landscape management plan for a minimum of 5 years. Both new and existing planting will be required to be included in the plan.

Particular attention to details of preserving vegetative screening of the development and management of meadow areas for visual amenity and ecological benefit.

Reason: - To ensure the proper management and maintenance of the approved landscaping in the interests of amenity and the character and appearance of the area.

ACTION REQUIRED PRIOR TO COMMENCEMENT OF DEVELOPMENT: LANDSCAPING SCHEME.

No development shall take place until there has been submitted to and approved, in writing, by the Local Planning Authority a scheme of hard, soft and boundary treatment landscaping works for the site, which shall include any proposed changes in ground levels and also accurately identify spread, girth and species of all existing trees, shrubs and hedgerows in the surrounding area. A specification of soft landscaping, including proposed trees, plants and seed mixes must be included. The specification should be in line with British Standards and include details of planting works such as preparation, implementation, materials (i.e. soils and mulch), any protection measures that will be put in place (i.e rabbit guards) and any management regimes (including watering schedules) to support establishment. This should be accompanied by a schedule, with details of quantity, species and size/type (bare root, container etc). Hard landscape details such as surface materials and boundary treatments must also be included.

Particular attention given to details of hard landscape material choices for the entrance and access road (ensuring they meeting needs of both Highways and SCC Fire service), material choice and



construction of decking areas and method of construction so that they comply with the arboricultural method statement.

*Soft landscaping; choice of species for tree planting and hedges need to be appropriate for the local area. Given the prevalence of ash dieback within the UK and the introduction of national measures to minimise the risk of the disease in 2012. The use of ash tree (*Fraxinus* species) within proposed planting schemes needs to be avoided and alternative species should be specified.*

Reason: In the interests of visual amenity and the character and appearance of the area. This condition is required to be agreed prior to the commencement of any development to ensure matters of tree and hedgerow protection are secured early to ensure avoidance of damage or lost due to the development and/or its construction. If agreement were sought at any later stage there is an unacceptable risk of lost and damage to important trees and hedgerow that would result in harm to amenity.

ACTION REQUIRED PRIOR TO COMMENCEMENT OF DEVELOPMENT: ARBORICULTURAL METHOD STATEMENT

Prior to commencement of development an Arboricultural Method Statement (including any demolition, groundworks and site clearance) shall be submitted to and approved in writing by the Local Planning Authority. The Statement should include details of the following:

- a) Measures for the protection of those trees and hedges on the application site that are to be retained,
- b) Details of all construction measures within the 'Root Protection Area' (defined by a radius of $dbh \times 12$ where dbh is the diameter of the trunk measured at a height of 1.5m above ground level) of those trees on the application site which are to be retained specifying the position, depth, and method of construction/installation/excavation of service trenches, building foundations, hardstandings, roads and footpaths,
- c) A schedule of proposed surgery works to be undertaken to those trees and hedges on the application site which are to be retained.

The development shall be carried out in accordance with the approved Method Statement unless agreed in writing by the Local Planning Authority.

Particular attention to the information supplied for the area around the entrance and access road, during both the construction phase and planned site use.

Reason: To ensure that the trees and hedges on site are adequately protected, to safeguard the character and visual amenity of the area, in accordance with Chapter 15 of the National Planning Policy Framework and all relevant Core Strategy Policies. This condition requires matters to be agreed prior to commencement of development to ensure that existing trees are adequately protected prior to any ground disturbance.

Finally I wanted to draw attention to the lack of detail regarding proposed lighting scheme and therefore no landscape comments or recommendations have been made.

If you have any queries regarding the matters raised above, please do not hesitate to contact me.

Yours sincerely

Kim Howell BA (Hons) DipLA CMLI
Landscape Consultant

Place Services provide landscape advice on behalf of Babergh and Mid Suffolk District Councils Please note: This letter is advisory and should only be considered as the opinion formed by specialist staff in relation to this particular matter.



Planning Services
Mid Suffolk District Council
Endeavour House
8 Russell Road
Ipswich
IP1 2BX

23/03/2021

For the attention of: Daniel Cameron

Ref: Planning Application DC/20/05763; Land at, Ling Road, Palgrave, Suffolk

Thank you for consulting us on the application for use of land for the siting of 4no. 'off-grid' holiday units and erection of replacement stores/housekeeping building; installation of PV panels, upgrading of existing access and track; new low-impact parking area and foul drainage

This response focuses on the landscape and landscape impact of the proposals. The planning application itself does not include any specific landscape supporting information, analysis or survey work to accompany the proposal. For a site within (and adjacent to) such a sensitive landscape setting, we would have expected to see a Landscape Assessment produced to accompany this proposal.

The site is located within the Wooded Valley Meadowlands & Fens Landscape Character. Relevant to this application, the visual experience of this character area is described as;

".....edges of this landscape are often formed by main roads or urban fringe, such as at Beccles, overall, the impression is of a quiet hidden landscape, usually undisturbed by the human activity taking place to the north and the south."

and

"...the visual condition is threatened in places by the conversion of traditional grazing into pony paddocks with their associated field shelters and fencing tape, rather than the more robust and discreet methods used for cattle."

The site itself lies within an existing Special Landscape Area and is adjacent to the Worthing Ling SSSI.

Existing Policy CL2 Special Landscape Areas (Mid Suffolk Local Plan (1998) Saved Policies) states that development proposals in Special Landscape Areas will only be permitted where they maintain or enhance the special landscape qualities of the area and ensure that the proposal is designed and sited so as to harmonise with the landscape setting.

We have several reservations regarding this proposal, as well as the lack of an accompanying Landscape Assessment to demonstrate how the negative impacts can be mitigated. In terms of the perceived impact on the existing site from a landscape perspective (as referenced above) we would not be supportive of this application. However, if the LPA is minded to approve this application, we suggest the following further information is forthcoming to address some of these concerns:

1. The access point into the site is narrow and will require hedgerow removal to achieve the required site lines; a detailed planting plan showing the proposed and existing hedge should be submitted.
2. The character of the surrounding landscape is open, but a suitable landscape scheme should be produced to mitigate the impact this development will have on the site.
3. A detailed landscape scheme should be produced to accompany the application, including hard and soft landscaping and appropriate boundary treatment.
4. Ancillary buildings and hard landscape works need further details, particularly regarding materials, screening and boundary treatments.

If the matter raised above are addressed, we would expect to see an Arboricultural Method Statement (including any demolition, groundworks and site clearance) shall be submitted. The Statement should include details of the following:

- a. Measures for the protection of those trees and hedges on the application site that are to be retained,
- b. Details of all construction measures within the 'Root Protection Area' (defined by a radius of dbh x 12 where dbh is the diameter of the trunk measured at a height of 1.5m above ground level) of those trees on the application site which are to be retained specifying the position, depth, and method of construction/installation/excavation of service trenches, building foundations, hardstandings, roads and footpaths,
- c. A schedule of proposed surgery works to be undertaken to those trees and hedges on the application site which are to be retained.

We would also expect to see a landscape maintenance and management plan for all the proposed landscape planting which sets out the maintenance regime for a minimum of 5year period and includes all operations associated with the upkeep of the planting (including necessary replacements).

If you have any queries regarding the above matters, please do not hesitate to contact me.
Yours sincerely,

Ryan Mills BSc (Hons) MSc CMLI
Senior Landscape Consultant
Email: ryan.mills@essex.gov.uk

Place Services provide landscape advice on behalf of Babergh and Mid Suffolk District Councils Please note: This letter is advisory and should only be considered as the opinion formed by specialist staff in relation to this particular matter.

Consultee Comments for Planning Application DC/20/05763

Application Summary

Application Number: DC/20/05763

Address: Land At Ling Road Palgrave Suffolk

Proposal: Planning Application - Use of land for the siting of 4no. 'Off-Grid' Holiday Units and Erection of replacement Stores/Housekeeping building; Installation of PV Panels, Upgrading of existing Access and Track; New low-impact Parking Area and Foul Drainage

Case Officer: Daniel Cameron

Consultee Details

Name: Mr James Fadeyi

Address: Mid Suffolk District Council Depot, Creting Road West, Stowmarket, Suffolk IP14 5AT

Email: Not Available

On Behalf Of: MSDC - Waste Manager (Major Developments)

Comments

Good Morning,

Thank you for your email re-consultation on the reserved matters application DC/20/05763.

Waste services have no objection to this application.

Kind regards,

James Fadeyi

Waste Management Officer - Waste Services

From: Nathan Pittam <Nathan.Pittam@babberghmidsuffolk.gov.uk>
Sent: 22 March 2021 12:26
To: Daniel Cameron <Daniel.Cameron@babberghmidsuffolk.gov.uk>
Cc: BMSDC Planning Area Team Blue <planningblue@babberghmidsuffolk.gov.uk>
Subject: DC/20/05763. Land Contamination

Dear Daniel

EP Reference : 290047
DC/20/05763. Land Contamination
Land At, Ling Road, Palgrave, DISS.
Use of land for siting of 4no. 'Off-Grid' Holiday Units & Erection of replacement
Stores/Housekeeping building; Installation of PV Panels,Upgrading of existing Access and
Track; New low-impact Parking Area & foul drainage.

Many thanks for your request for comments in relation to the above application. Having reviewed the application I can confirm that I have no objection to the proposed development from the perspective of land contamination. I would only request that the LPA are contacted in the event of unexpected ground conditions being encountered during construction and that the below minimum precautions are undertaken until such time as the LPA responds to the notification. I would also advise that the developer is made aware that the responsibility for the safe development of the site lies with them.

Please could the applicant be made aware that we have updated our Land Contamination Questionnaire and from April 2021 will only accept the new form and advise them that the updated template is available to download from our website at <https://www.babergh.gov.uk/environment/contaminated-land/land-contamination-and-the-planning-system/>.

Kind regards

Nathan

Nathan Pittam BSc. (Hons.) PhD
Senior Environmental Management Officer

Babergh and Mid Suffolk District Councils – Working Together

Email: Nathan.pittam@babberghmidsuffolk.gov.uk
Work: 01449 724715
websites: www.babergh.gov.uk www.midsuffolk.gov.uk



Suffolk Wildlife Trust

Brooke House
Ashbocking
Ipswich
IP6 9JY

01473 890089
info@suffolkwildlifetrust.org
suffolkwildlifetrust.org



Daniel Cameron
Planning Department
Babergh and Mid Suffolk District Council
Endeavour House
8 Russell Road
Ipswich, IP1 2BX

4th May 2021

Dear Daniel,

RE: DC/20/05763 - Planning Application - Use of land for the siting of 4no. 'Off-Grid' Holiday Units and Erection of replacement Stores/Housekeeping building; Installation of PV Panels, Upgrading of existing Access and Track; New low-impact Parking Area and Foul Drainage. Land At Ling Road, Palgrave

Thank you for sending us details of this application, we believe our previous comments (March 2021) are still valid however, wish to provide the following additional comments:

We note from the Site Layout that a borehole and solar water pump are proposed to provide water for the holiday units, with the location to be confirmed 'by specialist engineers after ground assessments'. The site lies within 120m of Roydon Fen County Wildlife Site and one of Suffolk Wildlife Trust Nature Reserves. Therefore, we are concerned that the water abstraction from the borehole will have a negative impact upon the hydrology of the surrounding area and therefore the fens. Lowland Fens are a UK and Suffolk Priority habitat. The Natural Environment and Rural Communities (NERC) Act 2006 imposes an obligation on all public bodies, including local authorities, to have regard to the conservation of biodiversity, particularly of those species and habitats identified as being of principal importance, which are those listed on Section 41 of this Act. The National Planning Policy Framework (NPPF) (2019) (section 174) identifies that all development should protect and enhance biodiversity, including to 'promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.' Therefore, the development must demonstrate that it does not result in a negative impact upon this Priority Habitat.

Please do not hesitate to contact us should you require anything further.

Yours sincerely

Jacob Devenney
Planning and Biodiversity Adviser



Suffolk Wildlife Trust

Brooke House
Ashbocking
Ipswich
IP6 9JY

01473 890089
info@suffolkwildlifetrust.org
suffolkwildlifetrust.org



Daniel Cameron
Planning Department
Babergh and Mid Suffolk District Council
Endeavour House
8 Russell Road
Ipswich, IP1 2BX

22nd March 2021

Dear Daniel,

RE: DC/20/05763 - Planning Application - Use of land for the siting of 4no. 'Off-Grid' Holiday Units and Erection of replacement Stores/Housekeeping building; Installation of PV Panels, Upgrading of existing Access and Track; New low-impact Parking Area and Foul Drainage. Land At Ling Road, Palgrave

Thank you for sending us details of this application, we have the following comments:

We have read the Preliminary Ecological Appraisal (Greenlight Environmental Consultancy, February 2021) and we are satisfied with the findings of the consultant. We request that the recommendations made within the report are implemented in full, via a condition of planning consent, should permission be granted.

This development may also have an impact upon the adjacent Wortham Ling Site of Special Scientific Interest (SSSI). This site is designated for its lowland dry heath and acid grassland communities and as such is very sensitive to physical disturbance and nutrient enrichment. Therefore, no bikes should be stored on the site as outlined in the Planning Statement, as this will negatively affect the habitats. We also recommend that all occupants at the site are given information about the sensitivities of the site including that all dog waste should be removed.

This site lies directly adjacent to the River Waveney (Sections) County Wildlife Site. We therefore request that care is taken during the construction stage to ensure there is no pollution of the CWS, nor any dumping of materials within the river or on its banks. This also includes the stream on the north western boundary of the site, which feeds not the CWS.

The ecological report identifies the need for a bat activity survey to be conducted every season. This should be implemented as a condition of planning consent, should permission be granted. This is to establish the use of the site by foraging and commuting bats and ensure they continue to use the site. As foraging and commuting bats have been identified as potentially using hedgerows and trees adjacent to the site, then it is important that there is no light spill from external lighting and that dark

corridors are retained around the site. Therefore, the lighting onsite will need to be in accordance with current guidelines¹.

Barn owls have been recorded in the vicinity of this farm (Suffolk Biodiversity Information Service) and we have records from local residents of them onsite. The ecological report also identified the presence of barn owl pellets within the building onsite. Barn owls are listed on Schedule 1 of the Wildlife and Countryside Act (1981) which gives them special protection in addition to the legal protection afforded to all wild birds, their nests and eggs. This means that it is an offence to intentionally kill, injure, take any wild barn owl, damage or destroy its nest or eggs. It is also an offence to intentionally or recklessly disturb any wild barn owl whilst it is building a nest or is in or near its nest containing eggs or young. It is also an offence to intentionally or recklessly disturb any dependent young of wild barn owls. We therefore recommend that this barn is assessed for barn owls prior to any work commencing. Should this barn be identified as a barn owl roost then further information should be submitted to ensure that barn owls can be accommodated on site with minimum disturbance. A barn owl nest box should also be erected in a suitable location as compensation for the loss of foraging habitat and potential roost site.

We note as part of the proposals that new hedgerow will be planted, however, it is unclear what species will be used for the replacement planting. Whilst the application dictates that these features will be planted, there is no indication of the composition and range of species. In order to maximise the potential for biodiversity, a diverse range of native species should be used and this detailed within a plan.

A Biodiversity Enhancement Strategy should be produced, detailing the how the enhancements made within the Ecological Assessment are to be incorporated within the development, including their locations. A Landscape and Ecological Management Plan should be produced to detail how the habitats and open spaces on site are to be appropriately managed for biodiversity. These should be implemented as a condition of planning consent, should permission be granted.

Please do not hesitate to contact us should you require anything further.

Yours sincerely

Dr Simone Bullion
Conservation Manager

¹ ILP, 2018. Bat Conservation Trust Guidance Note 08/18: Bats and artificial lighting in the UK

From: Lynn Armes
Sent: 15 April 2021 09:55
Subject: ENQ/2021/0503 Land at Ling Road Palgrave

Dear Mr Cameron

Your ref: DC/20/05763

Thank you for your consultation on the above planning application.

I can confirm that the Council have no comments or views on the proposed use of the land.

The consultation has been dealt with at officer level.

Yours sincerely

Lynn Armes
Planning Officer