

**Paper to be tabled for Mid Suffolk planning committee meeting on 18 August 2021:
Response to committee report on planning application DC/20/05763 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, Ling Road, Palgrave**

Having submitted a detailed objection to the planning application I wish to make the following response to the committee report.

1 Nature conservation

Paragraph 7.3 of the committee report states:

“The site is in close proximity of recognised wildlife areas and therefore the potential harm to the nature conservation interest of these areas *is of paramount consideration*”.

In paragraph 7.6 the report concludes:

“In summary, none of the three ecology-related technical consultees object to the scheme and that “officers therefore do not consider there to be sufficient grounds to withhold planning consent on ecology-related matters.”

Until my recent retirement I worked for 40 years as a professional ecologist for the RSPB, Suffolk Wildlife Trust and Natural England where I managed teams carrying out impact assessments of development and responses to planning consultations. I have known the area in question since 1982 and live locally. I disagree with your officers’ conclusions on ecology related matters for these reasons:

Natural England’s responses to planning applications are no longer written by experienced local staff who know the area, but by a central team of junior advisers based in Crewe who rely on the information provided by the applicant and only carry out desk based assessments. It has missed some key points:

- It has missed the proximity of the application site to Roydon Fen LNR and has therefore not commented on the potential impacts on the Fen.
- It has missed the point that the proposed development on this land will sever the ecological corridor between Wortham Ling SSSI and Roydon Fen LNR and remove the potential to restore its ecological quality, thereby reducing the potential to achieve net biodiversity gain in line with the NPPF 2019.
- It has missed the issue of exacerbating recreational disturbance on Wortham Ling SSSI and the inadequacy of the applicant’s proposed mitigation which suggests that some leaflets about alternative sites for recreation will somehow persuade visitors not to make the short walk to the Ling but, instead, get in the cars and drive to other more distant locations.
- It has missed the fact that its own national specialist on peatlands, with whom I have spoken, supports the need to notify Roydon Fen as an SSSI and that the notification

should include the whole peat body and its immediate catchment, which would include the application site.

The Natural England response is therefore inadequate and cannot be relied on by your officers.

Secondly your officers have misunderstood and misrepresented the response from the Suffolk Wildlife Trust as not being an objection. The Trust amended its initial response, in which neglected to mention Roydon Fen, with a follow-up stating:

“.....we are concerned that 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.” They refer to the obligations placed on local authorities by the requirements of S41 of the Natural Environment & Rural Communities Act 2006 and section 174 of the NPPF and conclude that “Therefore, the development must demonstrate that it does not result in a negative impact upon this Priority Habitat.” The application makes no reference to this priority habitat and does not demonstrate no impact, so the Trust's position cannot therefore be inferred to be no objection.

The Trust has also failed to mention that the proposed development on this land will sever the ecological corridor between Wortham Ling SSSI and Roydon Fen LNR. Compare this to the Trust's response to the previous application for holiday lodges on this site in 2015 where it stated: The application site therefore forms part of the ecological network of the area. Development in this location has the potential to have an adverse impact on this network and affect the ecological connectivity along the River Waveney.” It would seem this was written by a much more experienced officer at the time.

Therefore it has to be said that the Trust's responses to developments on this site are inconsistent and the latest response is inadequate and cannot be relied on by your officers.

The Council's own internal ecological adviser also seems to have missed these same points and, in my view, has been over-reliant on the report written by the ecologist contracted by the applicant. I don't know what their excuse is, but I imagine they are similarly pressed for time, unfamiliar with the area and are over-reliant on a desk based response.

2 Flood risk

The second key point which has been dealt with very superficially in the committee report is the problem of flood risk. Paragraph 8.1 of the committee report merely says that “The tourist units are deliberately located in Flood Zone 1. The development therefore does not present an unactable flood risk”.

This is incorrect. Much of the site is within Flood Zone 2. This zone has a very wide estimate of probability, ranging from 1 in 100 to 1 in 1000. These flood risk estimates are based on mathematical models and are highly variable at a local level. Real observations tell a different picture; zone 2 land in this locality has flooded twice in two consecutive years.

This suggests that even these very variable EA predictions are unreliable, and will become more so as the frequency of climate change driven extremes increases. The nature of climate change is that the occurrence and consequences of events at a local level are not easily predictable; the predictions are only reliable at regional, national and international scales. It is therefore possible that flooding will occur at this location at a much greater frequency than is suggested by the applicant.

As this is agricultural land within the floodplain of the River Waveney it serves an important role in mitigating the risk of flooding which could affect people's homes and livelihoods further downstream in Diss. Converting this agricultural land to a holiday development occupied all year round will not only create risks for the development itself but will reduce the ability of this part of the floodplain to contain flood water, with the consequence that flooding is more likely to occur in Diss.

Moreover, this flood risk prediction is only about surface waters. What it fails to take into account is that the River Waveney is not contained within its channel; water also flows within the sub-surface alluvial deposits either side of the river, which extend across this whole site. Therefore the flood risk map does not show that the soils underlying the application site will become regularly waterlogged, particularly as climate change leads to wetter winters, as predicted. To mitigate the effects of this water logging the applicant will no doubt try to improve the site drainage in future years, beyond the control of the planning authority, thereby disrupting the natural operation of the floodplain, reducing its biodiversity value and increasing flood risk in Diss. If this development is given consent it will contribute to flooding of people's homes and businesses in Diss.

3 England Peat Strategy and Climate Change

The applicant, your committee report and the consultees all fail to take account of the England Peatland Strategy developed by central Government and the implications for developing land in the flood plain of a main river for climate change.

The Government peatland strategy, published by Defra, states:

"England's peatlands are the nation's largest carbon store, as well as a haven for rare wildlife, an important part of our cultural heritage and natural providers of water regulation. However, England's peatlands are currently highly degraded and are emitting approximately 11 million tonnes of carbon dioxide equivalents annually, which is equivalent to 24% of emissions reported for the UK's agriculture sector in 2017. It is therefore vital we restore our peatlands to take action on our world-leading Net Zero commitment and for the sake of nature recovery. We will restore peatlands to deliver Natural Flood Management outcomes. Restored peatlands hold water and reduce run-off from the catchment, helping to reduce flooding in vulnerable areas."

Over the last 8000 years peatlands developed along this part of the River Waveney. Much of this has been drained and destroyed within the last 60 years. The surviving areas include sites such as Roydon Fen LNR. However, the area of peat extends well beyond the boundary of the

LNR and includes land owned by the applicant. Development here will limit the potential to restore this peat body, in line with the Government's England Peatland Strategy.

4 Summary

The proposed development should be rejected on the basis that it will:

- **sever the ecological corridor between Roydon Fen and Wortham Ling and remove the potential to restore the ecological quality of the Waveney valley;**
- **threaten the hydrological integrity of Roydon Fen;**
- **reduce the potential to restore the natural functioning of the flood plain to reduce the increasing threat of flooding in Diss;**
- **restrict the potential to restore the peatland soils on and around Roydon Fen, limiting the ability to improve the sequestration of atmospheric carbon, thereby contributing to climate change and preventing the restoration of peat to reduce flooding of properties in Diss.**

Gareth Dalglish

17 August 2021