

**REYDON PARISH COUNCIL  
PLANNING REPORT MAY 2022**

**1. Applications**

- a. DC/22/1498/FUL | Conversion of roof space to form viewing room plus shower room & balcony | The Saltings Bridge Road (deadline 18 May)

**PC to recommend approval**

- b. DC/22/0953/DRC | Discharge of Condition Nos. 3 and 5 of DC/21/3397/FUL - The proposed development of a single new build dwelling house. - As per planning conditions: submitting details of materials to be used, prior to first use. | Beulah 47 Wangford Road (deadline 4 May)

There are neighbour concerns about a possible second house planned for this site but this is not material to the application here.

**PC to recommend approval**

- c. DC/21/4479/DRC | Discharge of Conditions 3, 6, 7, 10, 11 & 12 of DC/20/2191/FUL - Creation of two sports pitches, St Felix School, Halesworth Road, Reydon

**PC to comment as follows:**

Reydon Parish Council has two significant concerns about these proposals which need to be considered in the context not only of the sport pitches application but also the related housing application DC/22/0462/ARM: Approval of Reserved Matters of DC/15/3288/OUT

**a. Impact of the Landscape and Ecological Management Plan on the County Wildlife Site**

The *Landscape and Ecological Management Plan* (LEMP) for the County Wildlife Site (CWS) has imported the plan for the *Strategy for the avoidance of recreational pressure* that was published in 2016 as one element of the application for outline planning permission for the housing development. This plan has been imported into *Appendix A: Biodiversity Enhancement Strategy*. Concerns have been expressed previously about the efficacy of the strategy, particularly regarding the proposed accessible natural green space (ANGS) and widening of footpaths to the South-west and South-east of the site respectively. If the aims of the LEMP are to protect or enhance the biodiversity of the site these two elements are particularly counterproductive.

The planning application acknowledges that an area of the current CWS will be lost to the replacement playing field. It does not acknowledge that further areas of the CWS are to be lost to the provision of a new ANGS or the substantial widening of the footpaths and creation of new permissive routes. These impacts do not appear to have been factored into the biodiversity metric calculations.

### **Regarding the southern ANGS:**

- Reydon Parish Council has written previously regarding concerns relating to clearance of this area. We are still awaiting a proposed meeting between the school, developer and planning officer to discuss this.
- This area of mature trees, scrub and deadwood is particularly diverse in terms of bird life (including recently nesting nightingales), reptiles and a plethora of invertebrates that are important for foraging birds, reptiles and bats.
- The area of the proposed southern ANGS floods frequently during periods of wet weather. This will result in use being limited.
- The Strategy for avoidance of recreational pressure was initially constructed in 2016. Since its conception a new network of permissive paths linking with this part of Shepherds Lane has been created. These include the Old Hall Café walks. This substantially increases local circular walks, reducing the need for the proposed permissive circular route.
- The ANGS and integral footpath are to be made on a 'permissive' basis. There is no guarantee that there would be public access in perpetuity. Should the school cease operation or, as recently, change ownership permission for use could be withdrawn.
- The LEMP acknowledges the nesting sites of nightingales, but does not make reference to the location. Nightingale nesting sites are habitat dependent. Destruction of this mature habitat in order to create the ANGS will result in the loss of future nesting opportunities. This is contrary to the claim of the LEMP to increase biodiversity.
- If it is still considered necessary to create an ANGS additional to that within the development site then alternative, less harmful sites should be considered. Perhaps to the north of the CWS adjacent to the new playing field where there will already be increased human activity and disturbance. That could fulfil the same purpose.

### **Regarding the widening of footpaths and provision of new permissive routes:**

The LEMP proposes widening the footpaths in the South-east corner of the CWS. It is highly likely that this will adversely damage the habitat that accommodates the sites of two singing male nightingales this year. The presence of nesting nightingales is acknowledged in the Ecological Impact Assessment. The route of the current PROW bisects the two nesting sites. The proposed additional permissive route appears to pass through one of the nesting sites. Although the widening of the current footpaths and creation of new permissive routes may be undertaken outside of the nesting season it will likely remove or expose some of the important habitat that is used by these birds. This could well result in the permanent loss of important nesting habitat.

### **Further observations**

The maintenance schedule includes control of bracken alongside footpaths by the use of chemicals. A preferable means of control would be by rolling. This is an approach used successfully on other local sites.

The Biodiversity Enhancement Strategy acknowledges the loss of a part of the CWS to the replacement playing field. However it fails to recognise the loss of habitat to the proposed ANGS to the southwest of the CWS or the loss of habitat relating to the proposed permissive footpath and widening of the PROW in the south east of the CWS. There is no recognition of the cumulative impact of these three elements in the proposed plan.

**In conclusion, some of the proposed activities contained within the LEMP that purport to enhance the biodiversity of the CWS may in fact further deplete it. We ask that the applicant is asked to revise the LEMP to take account of these concerns before Discharge of Conditions is approved.**

#### **b. Access Issues**

The Parish Council notes that Suffolk County Council, as the Highways Authority, has submitted a holding objection to application DC/21/4479/DRC due to unsatisfactory access proposals and inadequate provision for walking and cycling. The Parish Council shares these concerns as we have stated in our responses to both that application and the one under consideration here. We have previously asked for a comprehensive review of access to the school, the sports pitches and other community facilities and to the housing development and the development of a single safe access scheme for all these elements of the site. Addressing the concerns of Suffolk County Council now provides a perfect opportunity to do just this.

Such a review must consider the safety concerns expressed persistently by this Council and by residents of the numerous points of access onto Halesworth around St Felix, including the blind exit from Keen's Lane. This part of Halesworth Road is one where much of the traffic exceeds the 30mph speed limit. The Parish Council has asked for a roundabout as a means of both controlling some of the access and of slowing the traffic speed.

**The Parish Council, therefore, asks the LPA to work with the Highways Authority to develop a comprehensive and safe access scheme to all the facilities at St Felix and the existing and proposed housing schemes and which takes into account the need to reduce traffic speeds and improve access to Keen's Lane as well as better provision for cycling and walking.**

