



YARE VALLEY SOCIETY

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The objects of the society are to protect the natural landscape and wildlife habitats of the Yare Valley south and west of Norwich. The society supports projects which would enhance the valley but opposes developments that would detract from its natural qualities.

To: Norwich City Planning Application Committee

Yare Valley Society Consultee response to

Application Number: 22/01447/F

Location: Bartram Mowers Ltd Bluebell Road Norwich NR4 7LG

Proposal: Demolition of existing buildings, erection of 23No. bungalows, 74No. apartments, ancillary facilities, landscaping with associated works.

Please consider the following comments of the Yare Valley Society committee when considering this application:

Introduction

The Yare Valley green infrastructure corridor is of ever-increasing importance in the critical areas of countering the decline in UK biodiversity, tackling climate change, and providing informal recreational green space for the rapidly growing local population. Improvement of the corridor's green infrastructure is the objective of the Greater Norwich project for "The Yare River Parkway"

The site is on the slopes of the Valley, and prior to development, contributed to the Valley's green infrastructure. As such, Policy R42 of the present adopted Greater Norwich Local Plan saw the need to "protect and enhance environmental assets within and adjacent to the site" Since the time of adoption of that Plan the need for action on biodiversity, climate change, and green space has become ever more urgent, and so the environmental safeguards of Policy R42 should be rigorously enforced.

Dwelling density

Policy R42 of the Greater Norwich Local Plan (GNLP) envisaged the number of dwellings for the whole of the Bartrams Site as being "... in the region of 120 dwellings. This figure is based on an assumption that the site will be developed mainly at low densities to ensure that impact on the landscape is minimised". The GNLP aim was to "minimise impact on the landscape of the Yare Valley and important views", and for the development to "protect and enhance environmental assets within and adjacent to the site".

McCarthy and Stone in this latest version of Phase 3 application are proposing to build 97 dwellings in Phase 3 alone. These will be added to those of Phase 1 (61) and Phase 2 (50) resulting in a total of 208, approaching double the number of 120 envisaged in the GNLP. These high densities are a serious breach of the safeguards of Policy R42, and can be expected to have a detrimental effect on the environment, both visually and ecologically.

The high dwelling density of the development and its design breaches the environmental safeguards of GNLP Policy R42. It will have an adverse visual impact on the landscape of the valley and will degrade environmental assets within and adjacent to the site. The high dwelling density should be reduced in step with measures to increase ecological gain.

Landscape

It is noted that a Landscape and Visual Appraisal has been made for the latest phase 3 proposal, recognising the environmentally sensitive location of the development. It concedes that, at least in winter, parts of the development will be visible from various surrounding locations, and some measures for mitigation are proposed (see below).

It is welcomed that the development has now been moved away from the northern boundary to retain the majority of the mature boundary trees and the accommodation orientated to allow garden space facing the northern boundary to increase the visual and physical separation to the sensitive landscape beyond.

It is noted the accommodations blocks have been reduced to one and the block has been moved further south away from the northern boundary, and the reduction of its visual impact on areas to the north is welcomed. Unfortunately, the size of the single new block will have a greater adverse visual effect on views from the newly created green space to the west. Again, the high dwelling density should be reduced to lessen the impact, and appropriate additional tree planting undertaken.

Included in the Landscape & Visual Appraisal recommendations is:

“Additional tree and shrub planting and habitat creation to the west of the site to minimise visual intrusion to Bluebell Marshes and increase site biodiversity. Maintain the existing mature vegetation and bund along the northern boundary to minimise views into site from Strawberry Fields. Where required fill any gaps with native tree and hedge species.”

Unfortunately, there appear to be no details of structural landscape improvements within the area to the west of the development adjacent to Bluebell Marshes and also within the development overall. These are essential to be able to assess the degree of mitigation for amenity and biodiversity loss arising from the development.

Ecological Gain

McCarthy Stone’s own Ecological Report makes a number of recommendations for ecological enhancement. To take but one aspect, they include “Removal of existing trees on site should be avoided where possible” and “Removal of the existing hedgerows on the site should be avoided where possible and kept to a minimum if unavoidable” The proposals

would result in the removal of most of the relatively mature trees and shrubs in contradiction of Ecological Report's recommendations, and the R42 Policy to "protect and enhance environmental assets within and adjacent to the site, including retaining tree belts" The site tree survey suggests that many trees are not perfect specimens, *but they are established*, (important in drought conditions), and considerably more mature than any that are likely to be planted as part of the development.

The UK biodiversity is generally acknowledged as being in catastrophic decline. More needs to be done on this site to enhance biodiversity and provide sound "ecological gain"

Attenuation Pond

A separate application 22/01567/F has been lodged for an attenuation pond that is deemed to be necessary for this phase 3 application. The Society has commented on this application separately, and has suggested ways in which this should be designed to contribute to, rather than detract from, amenity and biodiversity.

Of particular relevance to this 22/01447/F application is:

While accepting that that an attenuation pond may be necessary to reduce runoff into the river and limit flooding downstream, little attention seems to be given to reducing the pond size by a greater use of water permeable surfaces of drives, parking areas etc., and by use of rainwater harvesting (e.g., rainwater tubs, rain gardens) within the site. Further reduction in runoff would be achieved by reducing the dwelling density, and by increasing the area of planted green space in the proposals. At the same time the site's ecology would be improved.

On site measures should be introduced to reduce water runoff and so enable the size of the attenuation pond to be decreased and the quality of its catchment water improved.

Thank you for considering these comments.

John Elbro

December 2022.

Chair

Yare Valley Society