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: 22/01567/F

Location: Bartram Mowers Ltd Bluebell Road Norwich NR4 7LG

Proposal: Enlargement of attenuation pond associated with previously approved Phase 2 open space.

Please consider the following comments of the Yare Valley Society committee when determining 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.

Location

The enlarged attenuation pond is shown in an area outside of the original Phase 3 development site and occupies a substantial part of the space to be opened to public access as part of the Phase 2 development. This possible loss of public access space is undesirable when the Yare Valley Corridor is already under stress from overuse as indicated by heavily worn footpaths.

The Public Access Green Space that formed part of Phase 2, should not be further restricted by enlarging the attenuation pond. The attenuation pond for phase 3 should be incorporated within the original site area for phase 3.

Size

While accepting that an attenuation pond may be necessary to manage 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, roads and 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, by retaining more of the existing vegetation, 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 (and filter) water runoff and to enable the size of the attenuation pond to be decreased.

Design and Planting

An attenuation pond in a public access green space linked into the projected Yare Valley Parkway should be more than a hole in the ground. It should add to the amenity of the open space rather than degrade it. Environmentally friendly infiltration basins can be designed to form an integral part of the public space as a seemingly natural feature. The landscape should be sculpted to create a natural setting. It should then be planted with trees, shrubs and other plants, improving visual appearance and providing habitats for wildlife.

The attenuation pond should be designed as a seemingly natural feature in the public green space with a natural landscape profile, and with an ecologically and visually sensitive planting scheme. The design should ensure the pond provides safe public access, visually enhances its surroundings, and improves wildlife habitat.

Water Quality

The pond as proposed would be in an ecological sensitive area, and also in an area having public access. On both counts, attention must be paid to the quality of the water entering the infiltration pond. Run off from roads, paths, and driveways can lead to oils and other pollutants entering the pond. This can be minimised by use of permeable surfaces to allow local infiltration into the soil, otherwise the water needs to be collected and cleaned before entering the pond.

The Water Strategy in the application for the site states *"As infiltration SuDS is feasible due to the permeable nature of the natural formation, the inclusion of permeable paving within the development should be considered at the detailed design stage, as this will provide the opportunity for water quality enhancement of flows from private car park areas and roads, and thus where incorporated, will offer an initial treatment train for surface water run-off."*

The application does not make clear that what safeguards for ensuring good water quality will be in place.

The application should make clear what steps are to be taken to ensure the water entering the pond is of a sufficiently good quality to avoid hazard to wildlife or to the public.

Management

A Management Regime will need to be put in place to maintain and improve biodiversity, amenity, and water quality of the attenuation pond into the future.

Conclusion

The present proposals are inadequate for an environmentally sensitive location with public access and ignores opportunities for increasing amenity and biodiversity. They fall short of what is to be found in modern designs for SUDs in green spaces. The application should not be approved without major improvement. More attention should be given to key design principles for SUDS such as to be found on p 11 of the RSPB publication "Sustainable Drainage Systems – Maximising the potential for people and wildlife" (https://www.rspb.org.uk/globalassets/downloads/documents/positions/planning/sustainable-drainage-systems.pdf).

Please take these comments into account when considering the application.

John Elbro January 2023

Chair

Yare Valley Society