

Application 2016/2430, Farmland Road, Costessey

1. The new application (2016/2430) does not address the reasons for refusal given by South Norfolk Council for application 2015/2927. The fundamental objection to the application is the permanent damage it will have on the open landscape of this part of the Tud valley. The revised application amounts to tinkering, by reduction in height of some buildings and provision of new landscaping proposals, which will not prevent the permanent harm to the river valley landscape.

2. The Environmental Impact Assessment screening by the Council plays down the serious environmental damage that the application proposals will have on the landscape and environment of the Tud valley.

3. The visual montages provided in the revised landscape assessment by the applicants are flawed and greatly underestimate the views of the development and the detrimental effect from

- East Hills Wood
- Farmland Road and properties surrounding the site
- Long views from various locations across the valley from Townhouse Road, Myrtle Avenue and nursery Road

4. Any issues relating to the current deficit in the 5 year land supply for the Norwich Policy Area (which includes Costessey) should not be given precedence over the environmental and other objections to this application proposal. Costessey/ Easton is a growth area for housing in the Joint Core Strategy and land has been identified in the recently approved local plan to accommodate housing increase in a planned way. The application proposal is seriously flawed and opportunistic and will cause permanent damage to the environment of the Tud valley.

5. The South Norfolk Place Making Guide (supplementary guidance to the Local Plan) describes the Tud valley as a

- a. small intimate valley with confined valley form and restricted views but more distant views from the upper slope
- b. remote, very rural character despite close proximity to Norwich
- c. small scale sparse settlement comprising occasional isolated farmsteads of vernacular character
- d. important green gap between the settlements of Costessey and New Costessey

Key design considerations

- respect the sparsely settled character of the valley
- maintain the distinct and separate settlements of Costessey and New Costessey
- prevent incremental development down the valley sides into this character area
- consider the impact of any development on key views to and from the River Tud

6. The application site is visually, geologically and ecologically an integral part of the River Tud valley, even though the Local Plan designation shows it partially outside. The river valley should be regarded as the whole area of escarpment between the ridges and at least the 20m contour. Local Plan river valley policies are entirely relevant to this application.

7. The site is outside the development boundary in the South Norfolk Plan adopted in 2015. The site is not identified in the Plan as a housing site and, although considered by South Norfolk during the Plan preparation process, was rejected as not being suitable. The current application is opportunistic and flouts the Local Plan process.

8. One of the purposes of the Local Plan is to provide certainty on where new development will be appropriate in order to meet strategic objectives. There is sufficient land in Costessey already allocated for new housing to meet strategic growth objectives eg Queens Hills and Lodge Farm Phase 2. The Plan is also a means of achieving balance in identifying areas where 'green' landscape should be retained.

9. The current open nature of the site greatly contributes to the landscape character of the Tud River valley ie wooded ridges with escarpments of arable or meadow land with other green uses. In the 2001 landscape assessment document states with reference to the Tud Valley (para 6.6) "The pastoral valley floor creates a very important green corridor of natural landscape separating the two settlements.."

10. The Tud valley provides a distinct separation between the built settlements of Old and New Costessey. A development of the application site will seriously erode the separation between the settlements.

11. If planning permission is granted it will set a precedent for other sites in the river valley, outside the development boundary, to be developed. Townhouse Road, granted permission on appeal in 2012, is an example of development outside the development boundary which will have a lasting adverse impact on the landscape of the Tud valley. The recently published local plan review of sites demonstrates that other sites in the Tud river valley are being targeted for development. The cumulative result would be disastrous in landscape terms for the Tud valley.

12. The detailed Landscape Appraisal submitted with the application misses the point in that the existing open use is an important part of the landscape of the Tud valley escarpment. The claims that views of the development can be mitigated by screening with new tree planting are misleading and flawed.

13. Long views of the open character of the site can be obtained from various locations in Townhouse Road, the Wensum valley ridge and from New Costessey... Even with new tree screening roof tops, with attendant solar panels, will be visible resulting in suburban encroachment to the rural character of the valley.

14. Development of the site will result in the permanent loss of agricultural land which is currently in beneficial use.

15. The proposed development will have an adverse effect on the existing ecology of this part of the Tud valley. The site adjoins the East Hills County Wildlife site and could affect bats (protected species) and birdlife. Other animals affected will be deer, foxes, voles, field mice. The proximity of the site to the Tud could also adversely affect otter (protected species). The concerns about any surface water discharge into the Tud have been raised by Norfolk Wildlife Trust.

16. The application proposes surface water drainage by SUDS and lagoons. This may not be possible in practice because of the geology of the site and could result in untreated water draining direct into the River Tud. The recent application at Townhouse Road (2009/1996/O) has highlighted the issues about SUDS being inadequate with direct drainage into the River threatening water quality and protected species such as white clawed cray fish and trout.

It is doubtful from the geological evidence submitted that the proposed 3 tier SUDS can be achieved (this was originally proposed at Townhouse Road on the opposite side of the valley and was subsequently abandoned because of underlying chalk).

NCC has requested further geotechnical information to prove that SUDS can be achieved.

No information has been submitted with regard to surface water draining into River Tud with consequential effects on water quality and the protected species in the river (comments from the Environment Agency have raised questions of WFD compliance which should be addressed as part of the drainage strategy rather than being left to a condition)

17. The proposed vehicular access through Farmland road is inadequate because of the narrow width of the carriageway. The road is also on a hill which problematic during icy weather. Increased traffic will be generated on the Grove Avenue/Richmond Road estate which already experiences problems of rat running, congestion and pedestrian safety.

18. The development will create pressures on local infrastructure including primary school places and healthcare facilities.

19. The opening up of land to the north west of the development site for public access may have some community benefit but does not overcome the considerable harm that will result from housing development in the river valley. If the Council is minded to grant permission the following specific comments should be considered:

- As there are specific proposals for this area of land why are they not included as within the red line boundary for which planning permission is sought? The proposals for this area constitute development and change of use and are an integral part of the overall development proposed.
- The proposed raised footpaths will form barriers to natural drainage and could result in direct drainage into the river by creating new channels from the housing development
- Restoration of the reedbeds and woodland will affect the natural flora and fauna of the area and should be supported by a habitat management plan

- A ecological management plan should be submitted for this area to establish responsibility for future maintenance, public liability insurance, health and safety requirements and wildlife conservation
- What is the timescale for implementation of the new public access area and, if it is not within the red line application site, how will the use and maintenance of this are be controlled?
- The creation of a publicly accessible natural reserve in the river valley could create traffic and parking problems in the new development by outside visitors to the area

For all the above reasons the Friends of the Tud valley object to application 2016/2430 and urge South Norfolk Council to refuse planning permission.

John Newby
Chair, Friends of the Tud Valley