



8th December 2016

Erection of up to 300 New Homes and the Creation of a New Community Woodland Park (Outline), Thorpe St Andrew: 20161896

Thank you for consulting Norfolk Wildlife Trust on this application. On the basis of the information provided, we have the following comments to make.

Norfolk Wildlife Trust **objects** to the proposal for erection of 300 homes within Racecourse Plantation. The principal reason for our objection is that the whole of the development is located within a County Wildlife Site. Policies within the Greater Norwich Joint Core Strategy (GNJCS) seek to protect County Wildlife Sites and the Area Action Plan for the NE Norwich Growth Triangle (NENGTAAP) does not allocate land for development within the CWS.

Impacts on County Wildlife Site (CWS)

County Wildlife Sites are areas of land rich in wildlife and, outside of nationally protected areas (such as Sites of Special Scientific Interest and National Nature Reserves), they are the best areas for wildlife in the county. They are selected using robust scientifically determined criteria and detailed ecological surveys. Information that we hold on the CWS, including recent survey information, shows clearly that the site continues to meet CWS criteria. The size of the CWS increases its ecological value in the local context.

In this context, Racecourse Plantation covers a total of 57.8 hectares and the area proposed for housing would take up 9.68 hectares. The proposal, although reduced in scale from previous proposals, still represents a major development that in our view will have a significant adverse impact on the CWS. Very few CWS have been subject to loss, or damage, as a result of development in Norfolk and there have been no losses in the last 20 years (since CWS were protected by planning policies) on the scale of that proposed for this application. This proposal would represent a loss of an area of CWS habitat that would be larger than the area of the majority of the CWS within Broadland District Council

CWS are protected by national and local planning policies and guidance. The NPPF states that land of "lesser environmental value" should be preferred for development. Policy 1 of the GNJCS states that development should "minimise fragmentation of habitats and seek to conserve existing environmental assets of acknowledged regional and local importance" The NENGTAAP does not allocate any land for development within any CWS and shows Racecourse Plantation as a primary green infrastructure corridor on the policy maps.

In addition to this it appears that not all of the wood lies within the ownership of the applicants and an area of approximately 10ha at the western end of the CWS is not included in the application. Although the final intention of the owners of that portion of the CWS are unclear it has been submitted as a potential housing area in the call for sites for the Greater Norwich Local Plan, which means it may also be lost development. The current development proposal would isolate that area of the CWS and set a precedent for that area to also be developed.

Green infrastructure and relationship to other developments

Areas nearby or immediately adjacent to Racecourse Plantation have been allocated for housing within the NENGTAAP. These include land between Racecourse Plantation and Salhouse Road (planning application already submitted) and land between Racecourse Plantation and Thorpe End. Although these areas will need to provide their own amenity green space, Racecourse Plantation



8th December 2016

serves as a key biodiversity green infrastructure asset within the vicinity of these and existing developments. This follows from the recognition of Racecourse Plantation, along with Brown's and Belmore Plantations as "existing core areas" of green infrastructure with priority links to other areas within the Green Infrastructure Strategy for Greater Norwich; the vision of which is supported by six principles including to "Safeguard and protect valuable green infrastructure resources". Following from the JCS and the GI Strategy the area is shown as a primary green infrastructure corridor in the NENGTAAP.

In addition to its ecological value, we recognize that this area is potentially suited to becoming publically accessible green infrastructure development in adjacent areas of the growth triangle. However, if the woodlands are to retain their ecological value whilst being publically accessible it is crucial that they remain a complete unit as is recognised in the GI Strategy and AAP. Even part development is likely to have a significant adverse impact on the CWS and there would be a need to compensate both for the loss of woodland and for recreational impacts of new housing on the remaining wood.

-

We do not plan to comment on detail on other aspects, as we have a major primary objection based on loss of CWS and GI asset, as set out above, which in our view is overriding. However, we do wish to make the following points regarding impacts on species and on woodland issues:

Impacts on species

We do not disagree with the majority of the survey results. However, there appear to be some discrepancies with information that we are aware that others hold on the site. For instance, according to information we have seen great-crested newt were identified in Racecourse Plantation in 2013 but don't seem to have been recorded in the current surveys.

The ecological surveys and reports that are submitted with the application seek to show that mitigation can be addressed for each individual species and the assessments concentrate on species and downplay the loss of habitat. However, we are not convinced that there is evidence for the views expressed in the Technical Ecology Report that the mitigation proposed "would significantly outweigh the negative effects on the CWS, habitats and species associated with the residential development"

Value of the woodland and woodland management

We are aware that there has been a disagreement over whether part, or all of Thorpe Woods should be classified as Ancient Woodland. Whether ancient woodland or not, the research that has been done, backs up the need to protect the site, as it clearly shows the historic value of the site and the continuity of a mosaic of unimproved habitats, including heath, wood pasture and woodland over a very long period of time. The findings of the report by Oliver Rackham highlight this value and conclude that the site deserves its designation as a CWS. In our view, a debate on whether or not it is ancient woodland is not helpful, either for planning or ecological purposes. The key issue is the value of the site in its own right in its context on the edge of the city.

In our view the value of the woods if subject to continuing forestry management has been underplayed. It is perfectly possible for woodland that is subject to forest management to have a



NORFOLK WILDLIFE TRUST

Response to Planning Application



8th December 2016

high biodiversity value and to be publicly accessible. In our view, well-managed woodland is completely compatible with improving biodiversity and with public access, as is shown by Forestry Commission and many private woodland owners throughout the country.

John Hiskett CEnv MCIEEM
Senior Conservation Officer