## Mitigation for flooding, surface water runoff, SUDS and river and ground water pollution.

- Has the removal of the trees on the edge of the Tas ditch impacted the flood risk for the site and the surrounding environment?
- The Local Lead Flood Authority states in its objection "the LLFA requires the applicant to demonstrate in the FRA there has been no significant change into the known level of flood risk to the site, present day or future which would have affected the outcome of the test." The baseline assessment was done in 2010. Have there been significant changes in projections or climate change events since then? Is there justification for the baseline assessment to be carried out again?
- Surface water flood risk map show a "vast majority" of the Deal Ground (DG and May Gurney (MG) site at "very low risk" of surface water flooding: Would this change with the proposed development and can this be forecast/tested?
- Trowse Parish Council (TPC) welcomes the use of SuDS measures in this development but want to ensure that these are adequate and suitable. See Neighbourhood Plan section 6.6 Policy 8.
- We note that the Lead Local Flood Authority has made an objection to this application on the grounds of insufficient information "to demonstrate that surface water arising from the development would not result in flooding of the proposed building or by discharging it to a location which would lead to the increased risk of flooding elsewhere."
- Trowse Parish Council would like to see a Condition put in place to require flooding assessments are completed in 10/20/30 years to ensure that implemented measures are still suitable and any necessary action taken.
- Trowse Parish Council would like to see a Condition added for assessments of the ground water level and water quality after the development is built and any necessary action taken.

In 2020 there was a significant flood event in Trowse, where both the Tas and the Yare flooded. This caused the Common to essentially become a lake; resident's homes and local roads were flooded. TPC would seek reassurances that the proposed development would mitigate against another flood like this both for existing and new residents.

## Mitigation for increased levels of traffic, noise, vibration, and a change in the air quality.

- We are pleased to see that the development is making provisions enabling people to have safer walking and cycling routes through the development and into the city and beyond.
- There is a concern that all traffic both construction and operational will be required to use the spine road, proposed for Bracondale/The Street and the current MG access road. We would **not** like to see an urbanisation of the village with the use of traffic lights or roundabouts to mitigate this but there are real fears about the volume/type of traffic that will be expected to use that junction. We would certainly oppose any additional traffic through the village. See Neighbourhood Plan Section 8.1 (97.
- Trowse Parish Council request a Condition that prevents contractor traffic through the village during construction.
- We appreciate that the developer is aiming to reduce the use of personal vehicles but inevitably cars will be used, and it is our belief that homeowners will have *at least* 1 car per household. Therefore, there is a concern over the proposed developments allocation of 0.9 parking spaces per dwelling. Parking in Trowse is already an issue and we would not want to see further pressure on already limited spaces. See Neighbourhood Plan policy 13. This policy also includes statements about parking on pavements which could impede the movement of cyclists, pedestrians, and those with mobility aids. We feel that a reassessment of the parking provision is necessary for the site. Our Neighbourhood Plan consultation results state that 95.8% of residents think that "any new development should not exacerbate the current on street parking provisions..."
- We note that it is part of the outline agreement that there is a 20-minute bus service into the city. Part of the S106 is for First Buses and TPC would like to know if there has been an agreement made with First Bus for a 20-minute service in accordance with the outline permission?

## Environmental impact and the importance of protecting the local ecology.

To ensure that suitable and adequate provisions are made for any impact on the local environment and ecology. Looking through the EAP and NCMP TPC have the following questions:

- Section 3.1.2 of the EAP states, "protection and where appropriate, restoration of habitats of ecological importance..." TPC would like to know how the removal of the trees along the Tas ditch has impacted habitats of ecological importance and how this removal is going to be mitigated? Will mature trees be planted to replace those that were removed?
- Section 4.2.4 of the EAP talks about fencing to protect the CWS that will be "subject to ongoing maintenance". TPC would like to know who is going to be responsible for this maintenance and for how long?
- Section 4.2.8 talks about the translocation of habitats. Will this be arranged by the developer? How will this be managed? Who will be expected to monitor and enforce this and for how long?
- Several sections in the NCMP talk about "appointed management company or other body". These agencies will be expected to manage things such as rotational coppicing cycle (4.3.3), amenity grassland (4.7.3) and the wetland meadow (4.7.4). What provisions will be put in place to ensure that they are managed correctly, in line with current environmental best practices? How will these activities be funded? The NCMP states in section 5.3 that funding will initially be supplied by Surruys Property Company, or subsequent landowner but in the long term it will be handed over to a management company or "other body" to be funded by an annual charge from residents or by dividends from an invested sum. TPC have concerns about these associated costs, how this funding will work in practice, and what the additional expense will be for homeowners. We believe that this is going to amount to a significant annual bill for them and we have serious concerns about its functionality in the coming years. Have cost calculations been made, both current and projected, for all the activities the management company will have to oversee? TPC believe that there is a very real possibility that these tasks will become the responsibility of the local authority which would put pressure on an already stretched public purse. TPC request some investigations into costs. Norwich City Council have indicted that they will not be taking on responsibility. If a resident's association or company is brought in to manage the site, how will it work over such a large and diverse site and how will the affect public access (i.e., people from outside the development as there have been issues surrounding this in development locally).
- Will Trowse and Trowse Millgate residents have a right to access to playgrounds and other public facilities in this development? **Can this be explicitly confirmed as a condition?**
- Trowse Parish Council request a Condition in place that will review management procedures and ensure that they are still adequate in 10/20/30 years.
- Trowse Parish Council request a review of the EIA after the development is complete and any necessary action taken.

## Trowse Newton's Neighbourhood Plan (NP)

Trowse Newton's Neighbourhood Plan is in the last stages of ratification and has been through all the stages of consultation. Section 5 of the emerging NP specifically talks about the development of the former MG site. We acknowledge that this site forms part of the East Norwich Regeneration Area (ENRA) and is subsequently set for development as part of the larger set of sites.

The NP details items that are considered valuable in terms of Trowse's unique identity and character and therefore in need of protecting. One of these is the approach to the village from the Bracondale bridge. There is a very clear change in the urban areas on the city side of the bridge at the ring road and roundabout to the currently green pastures, mashes, meadows and rural views when entering Trowse. The NP aims to protect this by ensuring that any development of the MG site does not alter the transition of moving into a village. When consulted, residents were very keen to ensure that the urbanisation of Norwich does not impact the village identity and character. (NP section 5 Objective A).

Trowse Parish Council recognises that although part of the ENRA development, the MG site will have to conform to the whole East Norwich Master Plan, but it is vital that houses on the MG site will be consistent with that of the village, not only in design but also in terms of housing mix. One point our NP consultation raised was the need for starter homes at affordable prices. (NP section 4 Policy 1). TPC are pleased to see that the current plans include both 2 and 3-bedroom terrace homes as well as larger family homes that are in line with the NP policy stated above.

Section 5 Policy 3 of Trowse Newton's Neighbourhood Plan is specific to the MG development area. In terms of the design of the properties on the MG site, TPC welcomes the use of natural materials such as wood and flint and would want to see a cohesive design in line with existing housing in the village or with rural styles that might exist on the edge of a village, such as outbuildings and low-profile barns. The most obvious of these are the red brick and flint terraces that front The Street and White Horse Lane and also the buildings along Whitlingham Lane and the Flint Barn, which have become synonymous with Trowse and its unique heritage.

Section 6 of the NP discusses biodiversity and green corridors. With the proposed development's proximity to Trowse Conservation Area, the CWS and LNR of Whitlingham Country Park we want to ensure that both suitable and maintainable natural habitats are offered throughout the development. We understand that management practices will be put in place during and after construction on the site but want to reiterate that these should enhance, restore, and maintain existing green infrastructure and where possible extend priority habitats and use species of flora and fauna that reflect the character of the area. They should be wild areas and not manicured and over-cultivated parks, especially at the edges the front the river banks.

Section 6 of the NP also discusses important views within the village, one of these being the view from the church and Trowse Meadow towards the city, both of which will be impacted by any new development of the MG site. **TPC would request a Condition of suitable screening with trees and natural habitat along the Yare Edge/Trowse Meadow to ensure that the character of the village is maintained.** 

Section 7 of the NP discusses community infrastructure with the objective to support recreational activities and improve community services and facilities within the village. TPC welcomes the addition of retail units on the MG section of the development but would be seeking reassurances as to its use. The village currently has no shop where everyday essentials can be purchased, and this type of facility would be a welcome addition and should be prioritised to be run by an independent operator or community group rather than a convenience store operator. This may require subsidised rent or split size units to be viable for a smaller operator. Other community facilities should be made available in terms of health and social care, childcare provision, information hubs and local arts as some of these are not readily available locally.

We are unaware of any provision for a medical surgery on the site and there are real concerns over the additional pressure a development of this size is going to put on local NHS services. Could/should provisions for this be made in the community buildings that are planned? We believe that the development should be expected to ensure suitable healthcare is available along with the improvements to existing local infrastructure through Section 106/278 agreements and/or planning conditions. We note that the NHS has asked for a substantial capital contribution to medical services, but we feel that these should be provided onsite.

As with medical care the same applies to education. The new Trowse primary school was built to mitigate the extra places needed due to developments built on White Horse Lane and Upper Trowse. This school is already nearing capacity, and we feel that education facilities are vital on the Deal Ground site. This will also mitigate the need for traffic to come off the site to get to other local schools at peak traffic times.

We would also recommend that provisions are put in place for the increased use of Whitlingham County Park (LNR) that the development is going to produce. During the pandemic the Whitlingham (and Trowse village) saw an exponential rise in footfall, and this has put pressure on the park and its services. Having a significant development so close, (with easy cycle and pedestrian access) is going to put the pandemic size pressure on the park all year round. There is already a noticeable increase in pedestrian and cycle traffic over the bridge and The Street into Trowse and Whitlingham. This additional footfall and use also applies to Trowse Common, Trowse woods, Whitlingham Woods and other green spaces as the whole area is a popular escape from the city of Norwich. We have already lost additional green spaces and walks through development within the village, and this is concentrating use of the few green spaces remaining.

Facilities within the village will expect to see a further increase in use. This is thought to be a good thing for local pubs and restaurants but could prove detrimental for areas such as the Common. There is an already extremely well used playground, and adult gym equipment on the common. With its open space and play opportunities for youngsters we would expect this to become even more popular. Will provision be made in terms of S106 agreements, to enable this equipment to be adequately maintained and updated?

There is currently very little provision for young people (11-18) in Trowse. Would the developer be willing to work with the PC to improve or create facilities for this age group? Trowse is a growing village whose demographic has changed over recent years and the building of family home developments will lead to more young people needing activities to promote and healthy lifestyle and prevent anti-social behaviour.

The Parish Council and villagers have deep concerns over the state of the former May Gurney office buildings which are being vandalised on a frequent basis. They are not adequately protected or monitored. **TPC request the renovation and reuse of these building as a condition of the reserved matters** planning permission with a time limit set for properly securing these buildings to make them safe for the protection of the buildings and the approach into Trowse.

Trowse Parish Council would also like to ensure the protection of the Pumping Station buildings on the Deal Ground section of the development.

We also note that the name for the MG section of the development seems to have changed from Yare Edge to Yare Newton. TPC would not support this change and would like to see the continued use of the Yare Edge so as to avoid confusion with Trowse Newton.