**Thorpe Hamlet specific ward councillor response to GNLP Reg 19 Draft**

**East Norwich**

**2.6 -2.8**

Protecting wildlife and heritage sites, and water storage for the event of flooding will be critical the the success or otherwise of the project.  Local opinion has previously shown enthusiasm for pedestrian and cycle links to Whitlingham.

This is an opportunity to provide pedestrian and cycle links between Norwich and Whitlingham. If this opportunity is not taken the local transport system will not allow people to make the journeys they want to make and an opportunity to lower carbon emissions will have been lost.

However a road bridge to Yarmouth Road would change the  quiet suburban character of Thorpe, adding noise and pollution and reducing air quality. It would threaten marshland biodiversity and water storage capacity, and reduce the amenity of the river Wensum, thereby underming the River Wensum Strategy and conservation areas

While there may be a balance of conflicting needs, this policy cannot meet the soundess test for effectiveness as its delivery would cause significant harm to the objectives

Pleased to see co-ordination accross sites and the integration of sustainable transport.

**2.9**  Creating a new urban area will have huge impact on surrounding residents, and must engage the m at an early stage.

Resident consultation is vital in the design and development of this new site. Without good, early consultation with the local community, opportunities for improvement and suitable development may be missed.

**2.10**

The harm would be reduced if a low car neighbourhood were created, as in 2.11, which will need adherence along with excellent non-car alternatives as proposed

viii  Energy efficiency standards should reflect the best aspirations, at least passivhaus standard, but well beyond legal minimum in order to meet the legal requirement of zero carbon by 2050, and the physical, non-negotiable 6th Carbon budget.

Embodied carbon of building materials and preocesses must also be  accounted  to be consistent with national policy and therefore sound

ix The area covered by the Norwich East Partnership is prone to flooding. If this area is developed, detailed plans will be needed to mitigate against this risk.

xi

A new inclusive riverside community needs to include residential moorings and related facilities in order to be effective in delivering the sustainable development objectives that meet the needs of all

**2.11-13**

Developing the Deal Ground has received mixed views from residents who welcome the cycle bridge but have also raised concerns  about the height,  design quality and durability, flood resilience, traffic issues.

The new settlement must be built to at least passivhaus standards and have a traffic neutral impact, if not traffic negative

be consistent with the Climate Change Act and national planning policy and therefore sound.  Whole life cycle carbon analysis is necessary for new development to be sound and meet  Climate Change Act legal target.

**2.14**

Flood events are becoming more frequent and the percentage calculations may /may not have been updated to take this into account. A precautionary approach is necessary if the plan is to be deliverable for the long term  and effective .

**2.25 -7**

**Utilities site**

Has been previously allocated to renewable energy production.  Some local people had hoped to benfit from CHP (community heat and power) but this was never part of the plan.  There was near universal rejection of biomass burning for reasons of air quality, land use change (deforestation, loss of indigenous and agricultural land) to source wood pellets - all of which have since received more recognition as negative for sustainablility.

Given the increasing population density of the area, it would be sensible to rule out any combustion process and require energy to be generated from recognisably clean sources such as solar, wind, heat pumps The rejected option of biomass burning could be considered as an alternative, against which genuinely clean renewable non-combusition energy is positve, justified, effective and consistent

Whole life cycle carbon analysis is necessary for new development to be sound and meet  Climate Change Act legal target.

**Rose Lane**

[**Policy CC4: Land at Rose Lane/Mountergate | GNLP**](https://www.gnlp.org.uk/regulation-19-publication-part-2-sites-2-norwich-existing-allocations-be-carried-forward/policy-cc4)

More employement is to be welcomed, tho as noted, this must be compatible with the high density residential areas that surround CC4a and b

CC4a includes the area currently known as Rose Lane Garden. This space adds little to the potential housing number or office foootage, but provides significant value to local residents present and future.  I request that this small part be removed from cc4a, renamed as cc4c and allocated as Local Green Space (which could be greatly enhanced by CIL or 106 contributions form the rest of the site.)  This would contribute to the wellbeing of the many people living nearby with little access to nearby green space, and to  soundness by meeting the need in Para 8b of NPPF

 b) a social objective– to support strong, vibrant and healthy communities, by ensuring that a                 sufficient number and range of homes can be provided to meet the needs of present and future                 generations; and by fostering a well-designed and safe built environment, with accessible                 services and open spaces that reflect current and future needs and support communities’                 health, social and cultural well-being; and

Whole life cycle carbon analysis is necessary for new development to be sound and meet  Climate Change Act legal target.

**CC7, Horborough Lane**

Development is sound so long is it protects trees and proprosed river access and walk

Whole life cycle carbon analysis is necessary for new development to be sound and meet  Climate Change Act legal target.

**Policy CC8** - King Street Stores, Norwich (approx. 0.21ha) is allocated for residential use, with a minimum of 20 homes.

Current policies prioritise the recreation of the historic streetscape of King Street, building right up to the road.

While this may be appropriate at the northern, city end of King Street, it is no longer appropriate for the area covered by policy CC8, particularly as a number of mature trees now line the boundary between the site and the highway. It would be beneficial to keep these trees and to develop housing around them, in a careful manner which does not damage them. These mature trees are important as they help battle flooding, urban heating, climate change and biodiversity loss. The retention of these trees and the boundary wall outweighs the reinstatement of the street frontage. As the trees have matured over the last few years since policy decisions about this site were made, they are now of greater value, so policies affecting this site should be revised. Furthermore, we would like to see the retention of the warehouse buildings on this site, preferring to see them renovated and re-used, most likely for accommodation, rather than demolished. River access and the further retention and promotion of biodiversity also need to be considered as this site is developed.

The number and size of homes should not be more than is compatible with retaining both the heritage building and the existing mature trees

Whole life cycle carbon analysis is necessary for new development to be sound and meet  Climate Change Act legal target.

**CC15**

**Royal mail site - 15-17 Thorpe Road**

This is a mbrownfield site where employement and residential uses are welcome.

The boundary for this site contains a number of mature  trees in need of protection -

    at the corners of Stracey Road/Lower Clarence Road,  and Stracey Road and Thorpe Road. Between them is a deciduous hedge that may provide connectivity for wildlife between Rosary Cemetry and the railway embankment.

There are also 3 holly trees on the Thorpe Road boundary near the main entrance to the site.

These trees should be retained and protected.

It's not clear if Built frontages (Clause 2)  mean building up to the pavement, which would require removal of healthy beneficial trees and create a claustrophobic feel on the pavement, as well as reducing the options for gardens within the site. If so, this clause should be removed as th conflict with biodiversity and climate change requirements, and with the character and amenity of the area would make this part of the plan unsound.

Whole life cycle carbon analysis is necessary for new development to be sound and meet  Climate Change Act legal target.

# Policy CC16: Land adjoining Norwich City Football Club north and east of Geoffrey Watling Way

**2.196**  The draft deems this ‘site is critical to unlocking the regeneration of the wider area’ , I welcome the proposed ‘comprehensive approach to be taken to access, particularly in terms of  public transport links and pedestrian and cycle links’ and would like to add two additional points:

The re-opening a rail halt at Trowse would be a highly valued aspiration and solution

There is only a very small park for children from a large area, growing in population  to play. I would like to propose that the part of the site bordered by Kerrison Road, The Communitity Sports Foundation and Canary Way be taken out of the allocation and returned to its historic use as park/playground in addition the tiny park that replaced it when it was turned into a car park in 1990s.

Residents who objected when the children's playground was turned into a car park say they were told at the time that when the flats on Geoffrey Watling were occupied a larger park would be needed. This should be in the Local Plan, and land on south side of Canary Fields reserved for much needed open public space .  This change would contribute to the social, economic and environment objectives of Para 2 in NPPF, the requirement for high quality of surrounding developments, justified against alternatives,   and therefore to the overall soundness.   The population of the area has increased and will continue to do so, therefore more open amenity space is required for the plan to be sound.

With rapidly growing communities in the flats here, there is considerable need for more facilities and better transport. Current residents have a bus gate but no buses towards Wherry Road, and only one way to access and exit their homes by road onto Carrow Road.  This needs to be remedied to meet the traffic neutral needs called for elsewhere, and the climate change requirements.

This is implied in in para 2.196 and is essential to the deliverability and consistence and therefore  soundness of the plan

Whole life cycle carbon analysis is necessary for new development to be sound and meet  Climate Change Act legal target.

# Policy CC17a and CC17b: Land at Barrack Street/Whitefriars

**Barrack Street**

<https://www.gnlp.org.uk/regulation-19-publication-part-2-sites-2-norwich-new-allocations/policy-gnlp0409ar-gnlp0409br-land>

This is acceptable and welcomed, subject to social housing, environmental standards and traffic neutrality that make the plan consistent with climate and planning legislation

Whole life cycle carbon analysis is necessary for new development to be sound and meet  Climate Change Act legal target.

### Policy R13

Site of former Gas Holder at Gas Hill, Norwich (approx. 0.30ha) is allocated for residential development. This will accommodate a minimum of 15 homes.

Given the acknowledged constraints of the site, the steep hill and surrounding woodland, and the risks to properties above from undermining the hill on which they stand, a more sound plan would be to keep the area as woodland, helping to meet biodiversity and climate objectives and removing a risk to Thorpe Ridge Conservation area. The maturity of these trees, and the alarming facts and growing knowledge about biodiversity loss creates grounds, and indeed a need for updating both site specific and DM policies to reflect the need for perservation.

If this site were to be developed, soundness requires whole life cycle carbon analysis on all buildings

Lesley Grahame

Green Party Councillor,

Thorpe Hamlet Ward, Norwich