

16th July 2010



Norfolk Wildlife Trust Position on Belmore Park development proposals

Belmore Park is the name given by a group of landowners, under the banner of the "Broadland Land Group", to an area of woodland in Thorpe St Andrew, which was subject to an urban design exercise; the Belmore Park Charrette. The exercise, which took place between 6th and 13th July 2010, considered future development proposals for the area and sought to involve stakeholders and members of the local community.

NWT staff attended two sessions of the Belmore Park Charrette, taking part in a specialist landscape and environment meeting and attending the final presentation. Following the charrette, it is clear that it would be useful for us to set out our position in relation to the proposals that were put forward during the final presentation.

NWT's major concern lies with the two County Wildlife Sites (CWS) that cover the whole of the proposal area. These are Racecourse Plantation (CWS 2041) and Belmore and Brown's Plantation (CWS 2042). The citations and original surveys make clear that although, as is the case for all CWS, some areas are of greater ecological value than others; there is broad range of ecological interest, which warrants the inclusion of the whole area as a CWS.

Although it was evident, during the charrette that care was taken to ensure that wider aspects of the environment were taken account of when preparing the proposals, we are concerned that the biodiversity value of the land was seriously underplayed, along with the value of woodland in its own right within the Norfolk countryside. During the final presentation, there were exchanges between the presenter and a number of attendees regarding the wildlife value of the woodlands. Although NWT wouldn't necessarily agree with the manner in which these exchanges took place, we broadly agree with the assessment of the speakers that the site should not be considered as just a softwood plantation but a diverse area of woodland with a range of ground flora and a variety of other wildlife.

In planning terms the whole of Racecourse, Belmore and Brown's Plantations are designated as County Wildlife Sites. County Wildlife Sites are subject to national planning guidance and are protected by policy ENV 7 in the Broadland Local Plan. This policy states that "Development that would significantly affect the wildlife interest ofCounty Wildlife Sites.....will not be permitted". This policy is strong, as it stands and with our biodiversity remit we will argue that the ecological value of the site should not be compromised. As a result NWT will raise objections to any masterplan or planning application that is in line with the proposals set out in the final presentation.

In relation to emerging strategic plans, this area forms part of the Old Catton, Sprowston, Rackheath, Thorpe St Andrew Growth Triangle, for the Core Strategy of the Greater Norwich Development Plan. Consultation is currently taking place on a Statement of Focussed Changes to this strategy. Appendix 5 of the focussed changes sets out a concept statement for the growth triangle, which includes protection of existing important assets including CWS and refers to Rackheath and Belmore & Browns Plantations.

In addition, both plantations are shown as core areas within the Ecological Network for Norfolk that provides the evidence base for the biodiversity aspects of the Greater Norwich Green Infrastructure Strategy. This strategy forms part of the evidence base for the Core Strategy of the Greater Norwich Development Plan. In our view, development of the plantations at the proposed scale is likely to compromise this strategy.



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If, despite the above considerations, a planning decision were to be made in the future that the benefits of the proposed development outweigh the value of the site as a County Wildlife Site we would seek mitigation and compensation for the fact that only approximately one third of the current site would be likely to retain its CWS status. As we interpret the plans, this would be less than half of Belmore Plantation plus potentially the adjacent restored watercourse. Although 54% of the two CWS was proposed as green space in the presentation, a high proportion of this appeared to be formal parkland, village greens and narrow wooded strips adjacent to housing, which is unlikely to remain of CWS standard. Enhancement of this remaining area of Belmore Plantation would clearly not be sufficient to mitigate for the loss of the current site in order to compensate for this loss. This compensation would need to take account of the fact that mature habitats would be lost, which would necessitate creation of a larger area of new habitat in order to fully compensate for the loss. We would expect this compensation habitat creation to be in line with the Greater Norwich Green Infrastructure Strategy.

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