

COLTISHALL PARISH COUNCIL

20th March 2018

Greater Norwich Local Plan Team

Dear GNLP team

Proposed Greater Norwich Local Plan sites 0265 and 0388 in Coltishall

We are writing in response to the Regulation 18 consultation on the Greater Norwich Local Plan (GNLP). We wish to object to the potential inclusion of the above sites in the next Local Plan.

After we became aware of the proposed sites GNLP0265 and GNLP0388 (HELAA, pp279-283), adjacent to Rectory Road, Coltishall and the assessment of them as 'suitable for development', Coltishall Parish Council (CPC) was concerned that parishioners were completely unaware of them. In response, we leafleted every household (c. 600) in the parish to notify people and we organised an Open Village Meeting on 26th February.

Despite sub-zero temperatures and snow on the ground, 87 parishioners attended the meeting. Only a handful were aware of the GNLP consultation at all and only two had been aware of the site proposals before receiving our leaflet. 85 parishioners signed a petition against these site proposals there and then, and over 300 parishioners have now signed it. Time and weather constraints have prevented wider publicity of it.

The remainder of this document is:

- A) A summary of the views and concerns expressed by Parishioners about the impact of developing either of these sites on Coltishall; about the consultation process itself and about the quality of the suitability assessments.
- B) a planning response from Coltishall Parish Council based on national and local policy headings
- C) a brief summary of our collective concerns.

Yours sincerely

Suzanne Hall
Parish Clerk

Bob Grindrod
Chairman of the Parish Council

A. Parishioners' responses

Rectory Road

In plain English, parishioners are concerned that Coltishall cannot absorb further housing development on or near Rectory Road without creating huge safety and capacity problems in the immediate area and the village more widely. Rectory Road is a narrow residential road, paved on both sides. It has far too many access points due to constant development of additional 'unplanned' properties behind the housing that fronts the road. Far too many cars compete for the limited road-based parking spaces. It is already used as a 'cut through' between North Walsham and Wroxham Roads, and its one-way section is routinely abused.

Many village services are sited on or via Rectory Road – pre-school, school, surgery, village hall, church hall, sports fields, playpark – and it is on the village 2-way bus route. There are constant issues with buses being delayed through inconsiderate parking and constant concerns that the bus route will be changed to go down the main road. That would cut off people who rely on public transport from accessing services easily.

There is already planned additional pressure from 30 houses with outline planning permission on a greenfield meadow site at the north end of Rectory Road and yet no account appears to have been made of this in the GNLP documentation. Rectory Road is already the source of many complaints about alternating speeding, congestion and parking issues on an ongoing basis.

Character of Coltishall

Parishioners are concerned that over-development and over-population will alter the character of Coltishall as a Broads tourist village, attractive precisely because of its heritage, peace and green space. They are concerned that their services – pre-school, school, surgery – will be faced by demand that cannot be met, causing chaos for families whose children will have to be educated elsewhere and access issues for people needing health support. They are concerned for the safety of their children as they walk to school along a supposedly residential road which is already the source of many complaints about congestion, speeding and parking (especially during rush hours and school pick-up and drop-off).

The concerns being expressed are based not only on fear for the future but on experience of the present. Parishioners were not consulted on housing development in North Walsham, which has led inevitably to a huge increase in both heavy goods and commuter traffic driving through the centre of Coltishall to Norwich (where the jobs are). Similar concerns are being expressed about drivers from villages north of Coltishall changing their routes to gain NDR access via Coltishall where once they would have used the A140. Parishioners are very worried about plans for further housing – both locally at the COL1 site on Rectory Road and further afield (North Walsham, RAF Coltishall) – that will lead to an inexorable rise in traffic and congestion in their village.

Economy of Coltishall

The impact of housing development in and around Coltishall is not just upon residents. Tourists have already expressed concern that Coltishall is not the peaceful place they expected, and some are being put off. Use of public parking space by residents, with more cars than parking spaces in their recently developed flats, is affecting local businesses. Permissive parking space at 'A Piece of Cake' teashop in the village centre is often full before it even opens. If people cannot park, then they will shop and eat elsewhere, and the economy will suffer. Coltishall is a tourist destination and cannot afford to lose its visitors.

Environmental concerns

Coltishall is also home to a wide variety of flora and fauna, much loved by its residents. There is great concern that the disruption of the green spaces and corridors that integrate the village with the countryside will do untold damage to the eco-system. There is widespread disbelief that the GNLP and Broadland District Council are prepared to put the character of Coltishall at risk by developing its greenfield assets. Are they truly unable to find sufficient brownfield development land?

Parishioners' concerns about GNLP consultation

Given the potential impact of these site proposals, there is a consensus that consultation has been inadequate. Even for those few who were aware of the GNLP, it was seen as a consultation about large-scale economic decisions and not about site proposals in villages.

GNLP consultation is largely online, and roadshows have been poorly advertised and have taken place well away from Coltishall. Those attending have been unable to take away written materials to share locally as none has been made available. Holding the consultation in mid-winter has exacerbated these problems. For those who wish to respond, there is no obvious physical address to write to and responses appear to be being taken by e-mail or web form only. This would appear to effectively exclude significant groups within the population.

Parishioners' concerns about Suitability Assessments

It is acknowledged that these are desk-based exercises. However, the published conclusions have generated considerable confusion and concern.

GNLP0265

Based on the information presented, this site will decant onto Rectory Road immediately next to the Village Hall/Pre-school car park and metres away from the entrance to St. John's Close where the school and surgery are situated. The statement that "any potential impact on the functioning of local roads could be reasonably mitigated" appears unsupported by any evidence. Rectory Road cannot be made any wider and services cannot rationally be moved. In any event, no mention is made of the impact on the many nearby services and the bus route which are in regular use by parishioners and visitors, much less the known congestion, speeding and parking issues.

Consideration of alternative road access onto Station Road is similarly fraught with difficulty. The road is narrow, visibility is poor due to bends and there is no footpath by the road. Speeding is commonplace. Even the footpath on the other side of the road is regarded as dangerous given the speed of traffic and the size of HGVs, which often either mount the pavement or drive so close that their wing mirrors become a hazard to pedestrians.

A green score for 'Accessibility to services' appears to relate to geographical proximity. The fact that they have no spare capacity is ignored. Utilities are rated 'green' and yet the text makes clear that significant upgrade is required. The development of a modern housing estate behind the conservation area landscape will continue the erosion of heritage character begun by over-development of the village centre with flats unsupported by sufficient parking spaces.

It has been commented that a conclusion that "constraints have been identified but subject to these being able to be overcome ..." could relate to colonising Mars as much as to developing Coltishall.

GMLP0388

It is unclear whether access to this site is intended via St. John's Close or via the indicated way alongside Coltishall allotments. Either access is fraught with difficulty. The assessment text implies access via St. John's Close, which contains a school and a surgery. Local opinion is unanimous that 'transport and roads' should be 'red' not 'amber' as access via St. John's Close would be highly dangerous. St. John's Close is already a source of widespread concern without any additional traffic. Access via the marked path to Rectory Road would also be dangerous as it decants straight onto Rectory Road itself, which is beset by visibility issues as well as the other problems listed above. It would also hem in the statutory allotments in Coltishall, which have been part of village life for over 100 years.

Not unreasonably, the repeated text "constraints have been identified but subject to these being able to be overcome ..." is being taken to mean that these sites are suitable if you say they are suitable, which is neither democratic nor reassuring to parishioners.

The issues with the GMLP Consultation itself and the wording of the Suitability Assessments have contributed to a widely expressed belief that there is no point in responding to the consultation as the Councils will do whatever they like anyway. We hope that is not true but the perceived shortcomings in the consultation process are making it harder to argue that there is continued value in democratic participation.

B. Parish Council response to GNLP0265 and GNLP0388

The character of Coltishall

“Our historic environment – buildings, landscapes, towns and villages – can better be cherished if their spirit of place thrives, rather than withers.” NPPF, p. i.

Coltishall Parish Council is gravely concerned that piecemeal planning decisions, considering individual characteristics of specific sites, will lead to the eventual erosion of the character of Coltishall as a historic Broads village and tourist attraction. Its spirit of place is being put at serious risk through often opportunistic over-development. Continued focus on achieving housing targets risks destroying the ‘spirit of Coltishall’ that has taken centuries to achieve.

Coltishall is an ancient Norfolk village with a rich economic and residential heritage. Much of it is a conservation area and much of it falls within the Broads Authority national park. Indeed, Coltishall is known as ‘the gateway to the Norfolk Broads’ and has been described as ‘the most picturesque waterside village in Broadland’. A significant number of people here rely on tourism for their living. In addition to significant river traffic, the village is on the Bure Valley Railway line. It supports several highly regarded pubs and tearooms. In addition to the Norfolk Mead hotel, there is also a range of B&B options. The High Street is populated with a range of independent and high-quality shops, with a strong artistic presence. It is a place that people come to relax and enjoy their leisure time.

The rural idyllic nature of Coltishall is already under significant pressure from housing development. The building of multiple flats with one parking space each in the village centre has caused residential parking to spill over significantly into shopping spaces. This is having a visible and negative impact on local trade. The already planned development of 30 new houses at the village edge on Rectory Road on a greenfield site will bring an additional 400+ daily car journeys to the village. The Parish Council receives and usually resists regular planning requests for changes of use or ‘developments with architectural merit’ that challenge existing settlement limits. It should also be noted that Coltishall is largely a ‘dark sky’ village, and many parishioners are committed to this essential characteristic of village life. The idea of further greenfield development on sites neighbouring Rectory Road being entertained in the GNLP has therefore been met with widespread shock and disbelief.

The development of hundreds of new homes in North Walsham is having a serious impact on the village through a huge increase in both heavy and commuter traffic to Norwich passing through the centre of the village. Unplanned diversion of traffic from northern villages to access the NDR via Coltishall is making things worse. This may become an unmitigated disaster if hundreds of new homes are considered near Buxton/Badersfield. Traffic and congestion is already deterring tourists and significantly affecting the quality of life in the village. Several tourists have indicated to B&B and teashop owners that they have been shocked at the constant noise and traffic on our High Street. Speeding through the village is commonplace (though not by residents according to Speedwatch data), and evidence from SAM2 about average speeds in the 30mph zone is alarming. No planning consideration appears to have been given to the impact on villages like Coltishall that sit on the road between the ‘affordable’ housing in North Walsham, planned housing in Buxton and the main source of local jobs in Norwich.

General Considerations (Broadland Policies GC1-GC5)

“Local planning authorities should create a shared vision with communities of the residential environment and facilities they wish to see.”

“Planning ... [should] be genuinely plan-led, empowering local people to shape their surroundings.”

National Planning Policy Framework (NPPF, para 69)

A shared vision requires participation. CPC is concerned that:

- the timing (winter)
- accessibility (online with roadshows mainly requiring car access)
- documentation (online only – not available for people to read in print)
- difficulty in responding (online only; no physical address provided)
- difficulty in submitting feedback (several parishioners have tried and failed to use the online system, finding it impossible to navigate)
- and lack of outreach (one 5-minute presentation with no questions to Town and Parish councils in Broadland)

associated with the GNLP consultation has undermined its democratic accountability. The difference in response rate from Coltishall parishioners before and after provision of village-centric information by CPC should be salutary to the consulting councils, as should their widely expressed belief that there is no point in responding to the consultation.

CPC has deliberately chosen to invite parishioners and local institutions to respond by petition to the GNLP process because its previous protestations about the lack of sustainability or suitability of development of Rectory Road were systematically ignored over a number of years of the previous Local Plan process, leading to outline planning permission for 30 houses being granted.

Policy GC1 provides a presumption in favour of ‘sustainable development’ – ‘change for the better ... ensuring that better lives for ourselves don’t mean worse lives for future generations’ [NPPF] unless adverse impacts outweigh the benefits or other framework policies restrict it.

No reference is made in GNLP documentation to the outline planning permission already granted for 30 new houses on Rectory Road, Coltishall (COL1, BDC 20170075, decision 17th May 2017, decision letter 6th November 2017), and so the impact of this development appears not to have been accounted for in the suitability assessments. This appears to significantly undermine their credibility. Any analysis of sustainable development must surely take account of what is already planned.

Policy GC2 provides that new development will be accommodated within the settlement limit.

We note that the settlement limit was previously moved against local wishes to accommodate the **greenfield** site COL1 on Rectory Road. Both proposed greenfield sites are outside the current settlement limit. Given the excess of housing land that has been put forward for the GNLP, we would question any further settlement limit change in order to

use **greenfield** land in a Broads tourist village such as Coltishall to meet housing development targets.

Policy GC4 sets out a range of design criteria for development.

We note particularly the requirements to respect:

- the environment, character and appearance of an area,
- the amenity needs of current and future residents;
- the need for safety;
- the need for appropriate infrastructure.

Rectory Road is the only access to many of the community facilities in Coltishall, including:

- the Primary School
- the General Practice
- the Pre-School
- the Village Hall
- the Church Rooms (hall hire venue)
- the village playground
- both village sports fields (football and cricket)
- Bure Valley FC clubhouse
- the Multi-Use Games Area
- the Allotments
- the Bowls Club

Despite the presence of these services, Rectory Road is a narrow, residential road with significant pressure on on-road parking space. Rectory Road is on the 2-way bus route through the village, albeit that two buses could only pass each other on many parts of the road by mounting the pavement. On a regular basis, CPC receives complaints about the volume and speed of traffic on Rectory Road; cars mounting pavements to drive around buses and bin lorries; the risk of poor parental driving and parking during school drop-off and pick-up; casual parking across driveways or at bus stops; delays as buses try to slalom between inconsiderately parked cars and, more recently, persistent ‘blocking in’ by parking across people’s drives. All of these problems will be exacerbated by the now permitted development of site COL1. We find it impossible to see how the further decanting of vehicles from sites GNLP0265 or GNLP0388 could be considered sustainable. We would characterise it as ‘highly dangerous’.

Environmental Policies (Broadland Policies EN1-EN4)

“Planning should contribute to conserving and enhancing the natural environment and reducing pollution ... and encourage the effective use of land by reusing land that has been previously developed (brownfield land)” [NPPF, p.5.]

EN1/EN3 provide for protection of biodiversity and the co-ordination of green infrastructure to support habitats. The fundamental character of Coltishall as a Broads village is based upon its rurality. Green space at the edge of the village joins a network of green spaces through the village to the commons to provide habitats and corridors for a huge range of flora and fauna. These two greenfield sites (and the now to be developed greenfield site at COL1) are main green arteries through the village connecting out to open

countryside or to woodland. Building houses on either of them would risk destroying an important Broadland habitat.

EN2 provides protection for valuable landscape. Coltishall is a blended patchwork of Broads Authority national park, conservation area, heritage sites and characteristic housing. There is already concern that a modern housing estate is to be placed incongruously at the edge of the village on Rectory Road. Modern estate housing development that effectively 'fills in' the green spaces shared by residents of Rectory Road would be entirely out of keeping with the current character of the area and would significantly detract from both resident and visitor amenity.

EN4 discourages pollution. Vehicle emissions form a major source of pollution in Coltishall, especially on Rectory Road, Wroxham Road, High Street and Station Road. Rectory Road is already a residential road being used as a main thoroughfare because of the location of village services and the need for public transport access to them. It already suffers from alternating congestion and speeding.

Employment Policies (E1-E3)

There is no expectation of significant new employment opportunities in Coltishall. In fact, we have noted a significant increase in traffic through the village in recent months as housing in North Walsham has become available. It seems clear that many people are buying houses in North Walsham and then commuting to Norwich through Coltishall. There is also a noticeable increase in heavy goods traffic travelling through the village. We have had no control over, or say in, planning policies that have in practice provided placement of housing and jobs that require people to commute through Coltishall.

We have, however, noticed a range of symptoms that are damaging our own economy, which is based significantly on tourism in the broadest sense. Visitors come by river, (tourist) railway and road to visit our highly regarded pub/restaurants, hotel, B&Bs and teashops and browse in our independent shops and art gallery. Even in winter they struggle to park as public parking spaces have been colonised by residential overspill parking from two-car families living in one-space flats in the village centre. They look visibly shocked by the extent of traffic and congestion on the High Street and, like our residents, struggle to get across it. Many of our hospitality providers have heard people say they will be less likely to return. In a tourist village like ours, it is imperative that character is not lost as jobs will be lost too. Our village has reached a point of housing and, equally importantly, vehicle saturation that is putting its unique character and therefore its economy at increasing risk.

Transport and Safety Policies (TS1-TS4)

We would expect that any further development in the vicinity of Rectory Road will be supported by a detailed Transport Assessment and Travel Plan. It is of great concern to us that repeated warnings about the road infrastructure in Coltishall, the extent of alternating speeding and congestion and the ongoing dangers to pedestrians appear not to have been heeded in making development decisions.

C. Summary

1. Rectory Road, Coltishall is already struggling to cope with the demand placed upon it by access to multiple services, being on a bus route, accommodating a burgeoning number of cars and ongoing unplanned development in green spaces behind the houses that front the road.
2. New development of 30 houses at site COL1 will exacerbate these problems but is not accounted for in GNLP assessments.
3. Planning decisions elsewhere – housing in North Walsham and the opening of the NDR – have caused a major increase in traffic through the village in the last 12-18 months.
4. Possible developments such as GNLP0265 and GNLP0388 either in or close to Coltishall will exacerbate these problems significantly.
5. New housing and new traffic flows risk materially undermining the character of Coltishall as a historical Broads village.
6. Any impact on the character of Coltishall will also damage the economy of Coltishall as many businesses rely on tourists seeking rural peace and quiet and access to shops and tearooms. They will not return if they find ever-increasing traffic, congestion and noise.
7. Many services in Coltishall – school, pre-school, surgery – are already under considerable demand pressure and some are fearful about coping with additional demand as they have no obvious way to expand.
8. For these reasons, the parishioners of Coltishall believe that further development would be detrimental to quality of life, contrary to the principles set out in National and Local Planning Policies and quite simply not sustainable.