



COLTISHALL PARISH COUNCIL

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Coltishall Parish Council GNL Regulation 19 Consultation Response March 2021

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1.0 Objection

Coltishall Parish Council objects to the regulation 19 GNL (henceforward the GNL) on the grounds that it does not meet the requirement for soundness in the NPPF para 35:

- a) it is not positively prepared as it is not consistent with achieving sustainable development
- b) it is not justified as it is not an appropriate strategy, taking into account all reasonable alternatives
- c) it is not effective, the goal of sustainable development will not be achieved by the plan
- d) it is not consistent with national policy- it does not deliver sustainable development in accordance with the policies in the Framework or legal requirements

2.0 Sustainable development

2.1 Definition of sustainable development

Para 7 of the NPPF says:

‘At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs.’

Para 8 of the NPPF states that the economic, social and environmental objectives of the planning system are interdependent and need to be pursued in mutually supportive ways so that there can be net gains across the objectives. The environmental objective is given as: ‘to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy’

2.3 NPPF guidance on conserving and enhancing the natural environment (section 15)

Para 170: ‘Planning policies and decisions should contribute to and enhance the natural and local environment by: a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan); b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland...’

2.2 NPPF guidance on sustainable transport (section 9)

Para 102 states that transport issues should be considered from the earliest stage of plan making so that:

‘...the potential impacts of development on transport networks can be addressed...opportunities to promote walking, cycling and public transport use are identified and pursued.... the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains...’

Para 103 states that ‘The planning system should actively manage patterns of growth in support of these objectives[i.e. those in para102]. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.’

2.4 Legal requirement to mitigate and adapt to climate change

Section 19 (1A) of the Planning and Compulsory Purchase Act 2004 requires that: ‘development plan documents must (taken as a whole) include policies designed to secure that the development and use of land in the local planning authority’s area contribute to the mitigation of, and adaptation to, climate change’.

3.0 Failure to meet requirement for sustainability

3.1

Failure of the GNLP to meet the NPPF definition of Sustainable Development; the GNLP does not comply with 19 (1A) of the Planning and Compulsory Purchase Act 2004

The Jan 2021 Sustainability Appraisal and Strategic Environmental Assessment produced for GNLP lists 13 significant and/or cumulative adverse effects which will result from the GNLP and which are not mitigated by other aspects of the plan. The list summarising these effects (table N7) is copied below

1 Reduction in air quality.

Due to the volume of development proposed, an increase in traffic flows and subsequent reduction of air quality would be expected to have residual adverse effects on human health. In addition, many new residents could potentially be located within 200m of a main road. Cumulatively, this would be expected to result in a reduction of local air quality.

2 Increased pollutant emissions, including greenhouse gases

An increase in pollutants including greenhouse gases would be expected following the development proposed within the GNLP. The introduction of 110,367 residents would be expected to increase traffic volumes and energy demand, which would be expected to result in an increase of pollutant emissions.

3 Increased greenhouse gas emissions

The proposed development of 49,492 dwellings within the GNLP would be expected to increase carbon emissions in the Plan area by 565,079 tonnes (based on 2018 estimates). This increase would be expected to exacerbate the impacts of climate change within Greater Norwich.

4 Fragmentation of the ecological network.

The GNLP would be expected to result in the loss of approximately 1,019ha of previously undeveloped land. This loss of land would be expected to include habitats and ecological links

between designated biodiversity assets ultimately affecting the integrity of the wider ecological network.

5 Reduced access to healthcare facilities

A total of 103 site allocations are located over 5km from an NHS hospital. Residents in some of the rural settlements of Broadland and South Norfolk would be expected to have limited access to emergency healthcare, which could potentially have detrimental impacts on human health.

6 Increased risk of urbanisation of the open countryside and coalescence

A total of 85 allocated sites are located on previously undeveloped land in the open countryside of Greater Norwich. The proposed development within the GNLP in these locations would be expected to increase the risk of urbanisation of the countryside and coalescence. SA/SEA of the Greater Norwich Local Plan: Non-Technical Summary January 2021 LC-663_Vol_1of3_Non-Technical_Summary_8_250121LB.docx © Lepus Consulting for Greater Norwich Development Partnership N20 Residual adverse effects

7 Loss of tranquillity

The proposed development of 49,492 dwellings across Greater Norwich, with a number of developments located within rural Broadland and South Norfolk, would be likely to result in a loss of tranquillity of the rural landscape as a consequence of increases in noise and light pollution.

8 Reduced access to facilities and services

The majority of new residents would be located in areas with good access to services and facilities, including convenience stores and bus services. Nevertheless, large areas of Broadland and South Norfolk have limited access to rail services.

9 Increased household waste generation

The proposed development within the GNLP would be expected to increase household waste generation within the Plan area by approximately 31.5%. Although GNLP Policy 2 seeks to support sustainable waste management, there is little scope to reduce the quantity of waste generated per household.

10 Loss of soil resources, including BMV land

Approximately 1,019ha of development allocated within the GNLP is located on previously undeveloped land. This would be expected to result in the permanent and irreversible loss of ecologically, and potentially agriculturally, important soil resources.

11 Impact on soil ecosystem services

Soil provides a range of essential services to the local area, including nutrient cycling, abating flood risk, filtering water, filtering air, carbon storage and providing the basis for vegetation to flourish. The scale of development proposed within the GNLP would be expected to increase pressure on essential ecosystem services.

12 Reduction of water quality and ecosystem services

A total of 85 allocated sites are located on previously undeveloped land. The proposed development at these sites could potentially result in the contamination of nearby surface waterbodies or groundwater. The proposed development within the GNLP could also reduce the ability of the aquatic ecosystem to effectively filter water, provide the basis for vegetation to flourish, have benefits in regard to mental and physical wellbeing, and support biodiversity.

13 Increased demand for water

The introduction of 110,367 new residents would be expected to result in increased pressure on the local water resource.

3.1

Failure to follow NPPF guidance on conserving and enhancing the natural environment (section 15)

Much of the harm identified by the Sustainability Appraisal and Strategic Environmental Assessment is due to the use of greenfield sites. Large scale greenfield development in Greater Norwich is inherently unsustainable and runs contrary to the guidance in NPPF para 107. 78% of housing (38,600 houses) is on greenfield sites. In addition, over 300ha is allocated to commercial use. 1019 ha in total of previously undeveloped land will be used. The plan allocates 4,220 houses to 'village clusters' and 6,800 to surrounding towns, plus windfall housing, and this is likely to be particularly harmful. Such development is contrary to good planning policy and is unnecessary. Large amounts of office and retail space in the city centre are likely to be redundant following the pandemic and to become available for redevelopment.

3.2

Failure to follow NPPF guidance on sustainable transport (section 9)

The policy of dispersion rather than concentration is contrary to guidance in para 103 of the NPPF.

Despite a stated commitment in the GNLP to sustainable transport and lowered emissions (paragraphs 93,97,152,157 and others) this is not backed by any specific proposals or commitments for public transport, cycling or walking (See 4.0 below), contrary to para 102 of the NPPF.

On the other hand environmentally damaging transport infrastructure development is at the heart of the plan ensuring that net environmental gain is impossible, contrary to guidance (NPPF paras 8 and 102).

The GNLP promotes large scale road building, including the Norwich western link road, ignoring the well-established fact that new road construction induces further road demand and is therefore unsustainable in terms of emissions as well as being directly destructive of the environment. It causes increased traffic in other parts of the road network.

While there is a requirement in the NPPF to maintain general aviation airfields, the GNLP commits to expanding this highly polluting and unsustainable industry. Policy 4 of the GNLP (strategic infrastructure) supports 'the growth and regional significance of Norwich Airport for both leisure and business travel to destinations across the UK and beyond'. The area allocated for aviation and business linked to the airport is 85.5 hectares (allocated but undeveloped plus proposed), by far the largest allocation by primary employment use.

4.0

Sustainable transport provision in the GNLP

If sustainability is a genuine consideration in determining the nature of development, and if the plan is to meet the requirements of the NPPF, then proposals for sustainable transport should be part of decision making from the earliest stages (NPPF para 102) and should be included in the plan and should form part of the assessment for development sites. However there are no such proposals in the GNLP.

Examples of commitments the might partly mitigate the harms inherent in the GNLP:

A network of protected cycle lanes with routes specified; a detailed commitment to safe cycle and walking routes to schools.

Recommendations on road junctions, pavements and other infrastructure, to make walking safer and more attractive.

Policy on speed limits and enforcement, and traffic calming

Improvements to existing bus services. Reinstatement of bus services. New bus services.

Proposals to link bus and rail services. More frequent rail services on the Wherry and Bittern lines

Moreover, existing infrastructure is described inaccurately, if at all:

Paragraph 88 refers to a 'relatively good existing cycle network'. There is no network in the sense of a broad continuous system even in Norwich. Outside Norwich, nothing exists that could be described as a network. The Marriot way mentioned is not a link to anywhere except for tourism and leisure purposes.

Paras 89 and 238 reference the transforming cities programme which may provide additional funding for buses in the TfN area, but no attempt is made to describe the existing service or how this might be improved and how changes might serve the new development.

Outside the TfN area the reference is to the Market Town Network Improvement Strategies. These reports are focussed narrowly on each town and are not a source of significant policies for linking centres using sustainable transport. The Wroxham and Hoveton report (closest to Coltishall) makes recommendations for tiny improvements to cycling and walking within those settlements and none for public transport.

No assessment is made in the GNLP of current road traffic volumes, how these have been affected by recent development, particularly the NDR, and how they might be affected by further development.

The approval of site allocations under the GNLP gives permission in principle for development. However, transport impacts and mitigating strategies have not been assessed prior to site allocation. This is not consistent with the NPPF paras 102 and 103.

5.0 Effect on Coltishall

Coltishall is a historic village on the River Bure with about 1500 inhabitants.

The village is midway between Norwich and North Walsham on the B1150. The B1354 also runs through the village. 2018 data from speed cameras show that there were approximately 5.2 million vehicle movements per year through the village.

The level of traffic in Coltishall diminishes the quality of life of those living and working in the village and impacts their health. The High Street and Station Road are acutely affected.

Coltishall has experienced major traffic growth in recent years as a result widespread development outside Norwich and the construction of the NDR.

Coltishall has a single inadequate, expensive, and unreliable bus service connecting the village to Norwich and North Walsham. There is no bus to the nearest town Wroxham where there is a rail station.

There is no provision for cycling. Road junctions and pavement widths prioritise vehicle movement over pedestrians.

Coltishall will suffer further traffic growth due the Norwich Western Link Road and dispersed housing development. As noted above there are no proposals for sustainable transport that might partly mitigate this harm.

5.1 Site allocations within Coltishall

There are 3 site allocations in Coltishall:

Col1 and GNLP2019 form a continuous site on Rectory Rd. Coltishall Parish Council has objected to the development of this site on a number of grounds, the most important being:

- a) It is a greenfield site with high levels of biodiversity.
- b) The footpath in front of the site is the route for pedestrians going to the school, playground and other amenities on Rectory Rd from the Ling Way estate on the other side of the B1150. The proposed development introduces three new roadways to be crossed. In addition it will be necessary to cross traffic from the development at two further points: on Rectory Rd at the crossing to the east side of the B1150 and at the crossing of the B1150 itself.
- c) There is an existing safety concern with the junction of Rectory Rd and the B1150. All traffic from the development will be routed to this junction. This is a potentially dangerous junction for all users, but particularly for pedestrians crossing the B1150. SAM speed camera data from Feb 2019 shows that in peak periods a vehicle passes every 4.3 seconds (northbound +southbound). 60% of vehicles break the speed limit

Col2 is a site on Station Rd. Station road carries very high levels of traffic. Coltishall Parish Council does not believe this is a healthy location for a residential development. There is no footpath on the east side of Station Road down to the high street and crossing the road to the west side would be perilous.

An objection to both developments is that they will be highly car dependent and add to the existing problem of heavy traffic. Significant sources of employment and education beyond primary level lie outside the village. The Coltishall Post Office has closed down- customers must now drive to Badersfield. Poor provision for walking and cycling generates vehicle traffic within the village.

It should be noted that the housing supply outlined for Coltishall by Broadland District Council previous local plan (37) and current local plan requirement (15-20) is already in surplus. Between 2004 and 2019; 57 houses have been given planning permission and built in Coltishall. This means that the houses expected for Coltishall have already been built based on Broadland District Council's plans.

6.0 Development needs

Para 40 of the GNLP says that it follows the standard methodology required by the NPPF in assessing need.

The target for housing in the GNLP is 49,492 houses up to the year 2038 which includes an exceptionally large buffer of 22% above the perceived need.

A 5% buffer is required by the NPPF and there is good reason for the GNLP to use a 5% buffer given that 78% of housing is on greenfield sites and is unsustainable, see 3.0 above.

Setting aside the question of the reasonableness of using a purely trend based methodology for development needs, which is irrelevant here, it is nonetheless possible to take a cautious view of the

predicted household growth derived from the 2014 methodology (Household Projections:2014-2039). Under that methodology population growth accounts for 95% of household growth of which 43% is due to immigration. The England and Wales Total Fertility Rate for 2020 was 1.6 (2019 1.65, 2014 1.85, 2012 1.93)- ie it is now well below the rate of replacement. The pandemic and Brexit may lead to falls in the non UK-born population, and this is suggested by data from the ONS labour force survey to sept 2020 <https://www.escoe.ac.uk/estimating-the-uk-population-during-the-pandemic/>

The minimum figure of 42,568 (40,541+ 5% buffer) should therefore be the housing target, both to reduce the harm of the proposed development, and to reflect recent demographic changes.

Rebecca Furr (Parish Clerk - on behalf of Coltishall Parish Council)