

HV01B - Submission Statement – Geoff Cook

Summary

The Hoveton part of the Local Plan should be declared unsound. Whilst everybody recognises the need for additional housing, this needs to be the right type of housing, and to be a reasonable allocation in the right location.

With regard to the Hoveton site (HV01/B), in my view the draft Local Plan has not been positively prepared and the allocation of the site for residential housing is not justified in terms of Bio-Diversity, Infrastructure, population impact on village and cost.

This paper provides a number of suggestions for a better way forward.

Introduction

I would like to introduce myself before I move on to the submission. I am a resident of Brook Park in Hoveton and have lived here since 2014 when the houses were completed. Although there are a number of issues relating to the estate which Persimmon and NNDC are trying to resolve with the recent involvement of Duncan Baker MP, the layout of the estate of 120 houses (2,3,4,5 bedrooms and affordable housing) with offset houses, private drives, open spaces, mature trees and children's play area has been, I feel, designed quite well between NNDC and Persimmon. However, at a ratio of 2.3 people per house it represents over 16% of the population of Hoveton.

My objective is to prove that the allocation of the Hoveton site (HV01/B) is not sound in each of the four categories and there is a better way forward.

I attended Matter 1, Matter 2 and Matter 5 and agree that Habitats Assessment was discussed but not the Regulations part, and that the Hoveton site was discussed in Matter 5 but only from a Developer's perspective. The Sustainability Assessment was not discussed in Matter 1.

Matter 1

The Sustainability Appraisal (SA) Report – January 2022 on page 268 assesses the preferred site (HV01/B). It is assessed against 16 Sustainability Appraisal (SA) objectives, of which 6 are Environmental. The site is mainly agricultural, growing wheat or potatoes, but there is a strip of land set aside around 2018 as a wildlife habitat. The set aside land is used by 2 species of Bat, 2 species of deer, hares, foxes, 22 species of birds and butterflies. A number of these species are protected, and some are at risk of extinction. (details available from the Parish Council).

The Environmental SA objective SA1 is to "...protect the most valuable agricultural land..." – but the score is "-" and the conclusion states "Loss of agricultural....land". Objective SA8 is to "...enhance....the landscape..." – but the score is "-" and the conclusion states " ...impact on

GI network". **Any residential development on agricultural land would not increase food production.**

SA6 and SA7 address Biodiversity, Fauna, Flora and Geodiversity. Both of these are scored '?' and the conclusion states "Biodiversity impact uncertain". Clearly, when the impact is **uncertain**, it is not a "**net gain**" and may even be a "**net loss**". The biodiversity net gain law which came into force on 13th February 2024 means that if habitats are destroyed by a development, equivalent habitats must be created on-site or nearby. The new habitats must also deliver a 10% biodiversity gain, rather than simply replacing what has been lost. The requirement for net gain has been in place since 2010. **It will be difficult to provide evidence of a 10% net gain when the starting point is unknown.**

The remaining Environmental Sustainability Appraisal objectives addressing climate change, energy, air quality and pollution are SA4 and SA5 which are scored "++" and "0" respectively, but it is hard to see how building 120 houses and 60 units of Elderly Care will reduce the impact on climate change. **A development of this scale suggests the score of "++" should be reduced to "0" or even "-".**

NNDC have reported the site as scoring positively for the 6 environmental SA objectives but the overall conclusion for the Environmental impact is stated in the SA report as "Scores neutral". However, 2 are unknown, 2 are negative, one is neutral and 1 is questionable. **This suggests that the score should be less than neutral and is definitely not positive. It indicates that the Local Plan (LP) allocating HV01/B in Hoveton as residential is not positively prepared, not justified, not effective, not consistent with national policy and is therefore not sound.**

Matter 2

Hoveton is assessed as a Small Growth Town rather than a Large Growth Village. This would increase the housing allocation by 18% potentially to over 2000 for the 20 year period of the LP.

The assessment was based on services, but these are provided for Wroxham and Hoveton (see Wroxham Neighbourhood Plan). In particular Schools (primary and secondary), Medical Centre, Retail outlets, Pubs, Hotels, Restaurants, Takeaways, Railway Station, Pharmacies, Opticians are provided for both villages. The services provided by Wroxham are Library, Petrol station, Vets and a Care Home.

Visitors always say they are going to Wroxham, but actually end up in Hoveton. Roys of Wroxham (the worlds largest village store) is in Hoveton.

The infrastructure is in keeping with a village not a town and it is not justified for Hoveton to be classified as a town.

Matter 3

North Norfolk is a Tourist Destination which should be sufficient reason to limit the housing growth over the next 20 years. Wroxham / Hoveton is a specific destination. **If housing is not restricted and roads cannot be improved, then tourists who regularly queue for 30+ minutes to get into and out of Hoveton will vote with their feet and the tourist industry will decline.**

Matter 4

The only reason that Elderly Care provision is proposed for HV01/B is because of NNDC policy that sites with 150 houses must have Elderly Care provision included. **There is no identified need and no research into whether this service could be provided by expanding the Care Home in Wroxham.**

Matter 5

The Hoveton site was not discussed adequately at the meeting. It was a presentation by a Developer, supported by NNDC as it helped them to deliver against the LP.

The infrastructure solution proposed for traffic would not solve the problem as the queue often stretches as far as the Wroxham Jet garage southwards and to the Brook Park roundabout northwards. **A through route from Tunstead Road to the Brook Park roundabout would divert existing traffic not alleviate it.**

The infrastructure solution proposed for sewage would not work unless the Belaugh and Whitlingham WWTP were both upgraded.

Other potential sites were not thoroughly researched because the NNDC preferred site would deliver the housing required. Another Developer has suggested that a different site (dismissed by NNDC) could deliver the housing requirements. **There is a brownfield site in the centre of the village which has been ignored.**

The original "fair share" of housing for Hoveton stated by NNDC at a public meeting in 2016 was 100 with no mention of Elderly Care provision. This has subsequently increased to 120 and potentially 150 both with an additional Elderly Care provision of 60 units. **Since 2016 two developments totalling 53 houses should have reduced the outstanding requirement to 47.**

For Brook Park 120 houses were built on 7Ha providing 0.58 Ha per house. For HV01/B the proposal is for 150 houses plus 60 units of Elderly Care providing 0.50Ha per house. With a through road this would become a very large development of 270 houses making up 30.3% of the Hoveton population excluding the Elderly Care provision.

The proposed site as stated earlier has a BioDiversity impact of unknown which means that the requirement (since 2010) to deliver a net gain could not be achieved. **Similarly the overall conclusion in the SA report for the Environmental impact is neutral but with 2**

unknown, 2 negative, 1 neutral and 1 questionable it is hard to see how this site could be allocated for Development.

Matter 9

Question 9.9 is the first time that BioDiversity net gain is mentioned but this is a key area with regards to Climate Change. The Hoveton site was assessed as “BioDiversity Impact Unknown” in the Sustainability Appraisal. **I find it hard to see how the NNDC Policy could measure any improvement (net gain) or allow an assessment of unknown in the first place.** My colleague from the Parish Council has emailed the Planning Policy Team with a number of specific questions about this as I’m sure you are aware.

“The single biggest threat to biodiversity is habitat loss, linked to food production on land and in the sea. Biodiversity needs space to survive.” (www.wild.org)

Matter 10

Matter 10, question 10.4 should include the Hoveton site as this is a greenfield site including both agricultural land and set aside land used by wildlife. Question 10.6 relates to compliance with infrastructure requirements which should be researched and fully costed to ensure the business case is still valid. For example there is a large discrepancy between the potential developer and the Parish Council for the estimated cost of the sewage pipe. Although it was stated in one of the early matters that the high school could be expanded on its existing site, this is not true for the primary school. **Will the primary school have to be moved or will a new school be built?**

Without a fully costed traffic plan how can the air quality issues at Wroxham Bridge and the mini roundabouts be alleviated?

These additional costs should be included in any development costs but they have not been considered in the LP before the Hoveton site was allocated. Who will pay?

Question 10.7 asks whether the cost of BioDiversity Net Gain has been properly assessed but this has not been considered in the LP before the site was allocated. **Where will the additional 10.6Ha + 10% net gain come from nearby to stop the site becoming an illegal development? This needs to be resolved before a site is allocated, not afterwards.**

Matter 11

Matter 11 question 11.1 asks whether the environmental policies are positively prepared. For the Hoveton site the LP considers the site to score positively in the Sustainability Assessment, but the overall conclusion in the SA report is stated as “scores neutral”. However, of the 6 SA objectives 2 are unknown, 2 are negative, 1 is neutral and 1 is questionable. **Clearly the policy is wrong if it is not justified, effective or consistent with national policy.**

Way Forward

With regard to the Hoveton site (HV01/B) , the LP has not been positively prepared and the allocation of the site for residential housing is not justified in terms of BioDiversity, Infrastructure, population impact on village and cost. **The Hoveton part of the LP should be declared unsound.**

NNDC should now work with the Parish Council to develop a Hoveton Neighbourhood Plan. This plan should dovetail with the Wroxham Neighbourhood Plan and address the BioDiversity and Infrastructure issues and agree the actual “fair share” of housing required.

The potential for expanding the Wroxham Care Home should be investigated and all the potential sites, including the brownfield site, should be properly assessed.

Everybody recognises the need for additional housing but this needs to be the right type of housing and in the right place.

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