



Hoveton PC response (December 2023) – NNDC draft Local Plan

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Appendix 1: Extract from Planning Consultation Response from Hoveton Parish Council to Planning Application PF/19/1659

(Please note that the proposed site allocation of HV01b in NNDC's new Local Plan is known as 'Brook Park Phase 2' within this document).

Planning Application PF/19/1659. Hybrid application: Full planning application for 150 dwellings (Use Class C3), a new link road between Tunstead Road and Stalham Road, associated infrastructure and public open space. Outline planning application (with all matters reserved, except access) for the provision of 1ha land for provision of up to 75 bedspaces of age-restricted care-dependent dwellings for elderly-persons, such as Extra Care / Assisted Living housing (Use Class C3). Land East of, Tunstead Road, Hoveton, Norfolk.

Hoveton Parish Council has now had the opportunity to listen to and fully consider the views of the local community regarding this planning application, including those gained from a public meeting held on 11 March (minutes from which are separately available).

Hoveton Parish Council OBJECTS to this application

This is on the following grounds:

1. Planning Policy

The proposed development is in a countryside location that is outside the existing planning allocations and outside existing planning policy.

As the emerging local plan is not yet finalised, the application has to be considered against current guidance for development in the countryside as detailed in current planning policy SS2. The development fails to meet any of the criteria in this policy and so should be refused on that basis.

The District Council also already has a 5 year land supply without this site (5.4 years) to meet the allocation in the current Local Plan.

The application is being put forward in advance of the local plan only because of a contractual obligation on the developer, not on valid planning grounds. This was admitted by the developer at the public meeting.

There is no convincing argument to support a challenge concerning the 5-year land supply and no other reason is being put forward to support an early application. The benefit from the proposal is all for the developer and the landowner at the expense of residents.

Premature approval would:

- 1) Deprive the communities affected (notably both Hoveton and Wroxham) of their right to be consulted about the emerging local plan.

- 2) Bypass emerging policy directives concerning climate change and air quality, as the houses built would not have to comply with more stringent standards, restricting carbon footprint and water efficiency in homes.
- 3) Deprive service providers such as Norfolk County Council and the NHS of their ability to develop a strategy to meet needs from a new development.
- 4) Deprive infrastructure providers, such as Anglian Water, of the ability to plan properly for increased demand while causing significant immediate problems for existing property.

It is acknowledged that the emerging Local Plan identifies Hoveton as a secondary settlement. The **draft** plan includes a new allocation for up to 120 houses for Hoveton. Even if this figure makes it to the approved plan (and this is by no means a foregone conclusion given significant infrastructure issues detailed below) the developments at Church Field and the Tilia development contribute 53 homes and mean Hoveton will only have to accommodate 100 homes. (Both these 28 & 25 home sites are outside the current NNDC Local Plan and they are outside the usual scale of 'windfall' site expectations.)

It is likely the allocation for Hoveton will reduce further once the Greater Norwich District Plan is factored in as will happen as part of local plan development.

The Parish Council will be challenging the current housing allocation which is disproportionate to the village of Hoveton and which risks altering Hoveton's character as an important Broads tourist destination.

Geographically, Hoveton is on the edge of the recently produced Greater Norwich Local Plan (GNLP) area. Within this, further development in Wroxham was not included as a preferred site for additional houses due to concerns about infrastructure issues (especially traffic) locally – this issue applies in an identical way to Hoveton. It would be perverse for a decision to be taken which would have the effect of completely undermining the intentions of the GNLP in relation to Wroxham.

We feel this planning application cannot be properly considered in advance of the NNDC emerging Local Plan having had the opportunity to also consider the wider impact on the adjoining parish of Wroxham, and the GNLP thinking.

In particular, we would emphasise that the emerging NNDC Local Plan has yet to fully reflect that:

- around 70% of all new jobs created in Norfolk will be within the Greater Norwich Local Plan (GNLP) area, rather than locally in NNDC.
- the GNLP decision not to allocate further housing in Wroxham in the new GNLP was due to infrastructure constraints, with the A1151 also running through our village being a key one.

These issues support the contention that housing for Hoveton should be revised downwards and also make this allocation conditional upon infrastructure improvements.

Importantly, the impact of approving this development now would be to thwart the local plan process in relation to the adjoining communities of Hoveton and Wroxham by imposing a much larger allocation of housing locally than is likely to be imposed by the emerging local plan.

The Parish Council is seriously concerned about the impact of this development on local services infrastructure and amenity as detailed below:

2. Services

Schools: The head teachers of both primary and secondary teachers attended our public consultation meeting. Both schools are full. Although steps could be taken to increase capacity, this will need to be progressed by Norfolk County Council. Even if approved, the extensions required would not be in place in time to meet the population increase arising from this sort of proposal at this point.

Health Care: The Manager of the local surgery has said the current surgery is at capacity. There are plans to build a new centre at Rackheath. This will not be available until 2023 and, in any case, will largely serve the expanding communities East of Norwich, where some four thousand homes are being built, so there would then be insufficient capacity locally.

3. Road Network

Hoveton Parish Council do not agree with Norfolk County Council's recently published Wroxham and Hoveton Network Improvement Strategy, issued in February this year. The study appears to be poorly researched and based on limited evidence. Both Hoveton and Wroxham Parish Councils are working together to challenge the conclusions and proposals.

Even this flawed report, however, concluded that the ancient monument that is Wroxham Bridge is a serious pinch point, with traffic volume regularly causing extreme congestion over the bridge, and along roads in both villages.

There is no prospect of an alternative route over the River Bure being provided.

The report also identified that the A1151 Norwich Road / B1140 Salhouse Road mini-roundabout and the A1151 Stalham Road / A1062 Horning Road / B1354 Horning Road West double mini-roundabouts could not accommodate any future increase in traffic flows without expensive intervention.

The report itself concluded that there should be no further development on the Hoveton side of Wroxham Bridge prior to the implementation of measures to deal with this extreme congestion.

No consideration has been yet given to how an **extra** 225 homes would impact the wider highway requirements and what would happen to our roads in the event this development proceeded.

Although Hoveton has a rail station and a limited bus service to Norwich, there will inevitably be a large increase in road traffic as a result of increased commuting and general household traffic (deliveries, social activities etc). All such extra traffic will have to negotiate the local pinch points with all these journeys contributing to congestion on the A1151 and other roads.

The developers own assessment fails to consider impacts of traffic beyond the immediate vicinity. There is no assessment of air quality in the local or wider area. The developer offers no solutions or ameliorations for the traffic congestion and air pollution made worse by this proposal.

Hoveton and Wroxham Parish Councils will now look to a new joint survey of the known hot spots for traffic pollution; the last air quality survey was done at least 10 years ago. In current circumstances, a representative survey can't be completed until autumn 2021 This important investigation into air quality relates to the health of all in the area and it is vital that decision makers have the best evidence before making their decision.

4. Foul & Surface Water

The Hoveton foul water network is increasingly under such stress that it fails to prevent regular foul water escapes. This is currently placing residents' health, property and the environment at unacceptable risk, particularly during periods of high river levels or heavy rainfall.

In wet periods, Stalham Road already suffers surface water flooding to the extent that surface water flows through to the lowest points nearby, causing flooding of roads and ingress into the foul water network. This has happened multiple times, including in October and November 2019 for example.

There are well documented wider sewer flooding and raw sewerage escape problems in Meadow Drive and Grange Close and there are also other areas of Marsh Rd and The Rhond which suffer regular loss of downstairs ablution facilities in rainy periods. Homes affected already experience raw sewage in gardens and roadways by their property and when it is raining, they live with the constant fear of sewage flooding into their homes. The preferred outlet for sewage from the proposed development is into Stalham Road network via the Grange Close manhole. This would add to the existing problems and make the nightmare of the residents a reality.

It is noted that Anglian Water (AW) raise no objection to this development claiming there is capacity in the existing network. History shows that the Pre Development and the Operation and Maintenance Departments at Anglian Water do not reliably exchange information - one department has stated that technically the foul water sewer has the spare capacity to accommodate new development while failing to register that another department regularly deals with sewer flooding and raw sewerage escape incidents.

The problems of flooding are not due to pump failures, nor can they be attributed to 1 in 100 year rainfall.

The AW 'Position Statement' which described the current problem and constraints has been altered to allow developers to submit a discharge strategy based on using the existing sewer network with a "hold back" facility supposed to lessen problems when sewers are in flood. Such a facility can only work for 24 hr periods and this, we know, is inadequate as the lower parts of the Hoveton network has regularly flooded sewers for several days at a time.

Furthermore, Persimmon has manifestly failed to demonstrate to NNDC that its surface water disposal on the existing Brook Park Phase 1 meets SuDS standards and doesn't contribute to the flooding on Stalham Road,.

It should also be noted that the developers own flood risk and drainage strategy report deals only with 150 homes not the 225 being requested by this application.

The Parish Council suggest that the degree and extent of foul and surface water flooding problems in Hoveton are so serious that NNDC, as the Local Planning Authority, should place a moratorium on major residential development in Hoveton until suitable solutions have been found or it can be proven that alternative provisions do not add to current problems. This needn't stop residential sites from being allocated for Hoveton in the new Local Plan but this should stop planning applications being approved until remedies are found, including upgrades to the sewage network.

In summary, Brook Park Phase 2 should only be progressed if and when it has been possible for AW to rework and upgrade the local sewer network to provide an alternative means of foul water disposal which doesn't directly connect into the Stalham Road foul water network or place the lower Hoveton part of the network under greater stress from increased demand. Please also note the objections from Belaugh Parish Council.

5. Housing Density

The developers are suggesting that the build will be high quality and attractive. However, the proposed 150 homes, plus the provision of 75 elderly care bed spaces, will be built on just 4 hectares. This compares unfavourably with the 120 homes in Phase 1 on an area of 7 hectares. The high density proposed is completely out of keeping with the local area, particularly Tunstead Road and Two Saints Close the roads most affected by this proposal.

Allowing a density of 8 per acre would be a closer to fit with the local environment and would also be more consistent with the phase 1 development. This suggests 72 households not 225 as being the site maximum.

6. Disturbance of Wildlife Habitat

The site is currently an open field. It is high quality agricultural land which is much needed to secure the UK food supply. Once taken it cannot be replaced.

The site is bordered by a long established attractive mature hedgerow along the Tunstead Road which is home to many birds and to other wildlife. It is a defining feature of the village interface with the countryside and it offers significant wildlife habitat and food source to warrant preservation. The loss of this rural landmark would represent a significant loss of visual amenity to road users and residents. The loss of the hedgerow appears to be a direct result of the high density of this development.

The Parish council considers that the existing hedgerow must be retained, both to support wildlife and to avoid significant visual detriment to local residents caused by its removal.

7. Climate Change

North Norfolk District Council has signed up to the Climate Emergency, recognising that everything must be done to aim towards achieving carbon neutrality by 2035. The proposed design of the new estate must, of course, meet the requirements of existing building regulations, but NNDC, in committing to take action on climate change the council is also required to consider much stricter requirements that will necessarily be contained in the emerging new Local Plan when it is published in two years' time. The developer has not made any serious proposals for how this development can contribute to the increasing challenge of carbon reduction.

We expect the new Local Plan to have supporting documents setting out new standards covering for example, renewable energy, water use efficiency, insulation efficiency, surface water drainage, landscape and wildlife habitat/connecting corridors.

These matters are all crucial to reaching carbon reduction and eco system preservation targets and it is vital that the Council does not allow a large housing scheme, such as this, to avoid making its contribution.

The Parish Councils view is that development should not be allowed to proceed until the new Local Plan is published and agreed so that the latest advice on carbon reduction technology can be included.

8. Local Support

The Parish Council is grateful to NNDC for allowing an extended period of consultation over this proposal. There is a groundswell of local opposition to this development which is expressed in the 100 or so objections filed with the planning portal,

The extent of local opposition was also expressed at the well-attended consultation meeting, despite the emerging threat of Covid-19. **Please also read the minutes of this meeting which includes evidence from local schools, health, police, Belaugh council and many local residents.**

Appendix 2: Education in Hoveton: Schools Capacity

Reference - Paper 4 'Infrastructure Position Statement (May 2019)- Hoveton

Section 6.12 "Although limited growth is proposed in Hoveton through the emerging Local Plan, and it is demonstrated that with the proposed expansion Broadland High Ormiston Academy School is sufficient to meet this future demand."¹

In a December 2023 a meeting between Hoveton Parish Council and the Broadland High School Head took place. It was confirmed that: -

- Capacity at Broadland High School is 750 pupils.
- Currently the school was over capacity at 757 pupils.
- Requests for new pupil places are coming 'in year' so total numbers are set to extend to 780 pupils, this is anticipated in the next two to three years.
- Some requests for places were already coming from families moving to the new developments at Rackheath which fall within the current catchment area Broadland High School.
- Broadland High School was unaware of any future agreed plans made for expansion, and is already in need of additional investment (gym, assembly hall, canteen too small, also need additional classrooms).
- Broadland High School had not yet seen any detailed plans for a new high school for Rackheath GNLP catchment (as proposed in GNLP).
- All other local secondary schools are at capacity, including Sprowston and Thorpe, so there is already a real need the extra school proposed at Rackheath.

Section 6.12 of NNDC's IPS also states: -

' It also must be noted that the Norwich Joint Core Strategy proposed significant growth within the Thorpe St Andrew Growth Triangle and that some of this growth will fall within the catchment of the Broadland High School. The Growth Triangle Area Action Plan adopted in 2016 sets out as part of the planned growth in housing there will be a need for a new high school, which will serve the Growth Triangle as a whole. Close consideration of this will be given through the Duty to Co-operate''

Given the influx of pupils from the growth triangle pushing Broadland High School over capacity, Hoveton Parish Council are seriously concerned that without a new high school, it will be impossible for Broadland High School to also cater for incoming pupils from the HVO1b development. **Our secondary school is running already at 'over capacity' and will soon be unable to cater for all catchment area, as at present. The lack of high school places is a current constraint to growth.**

Educational Constraints on Capacity at St Johns Community Primary School.

Our primary school is also at capacity in the current year, with just 3 spare places at December 2023. Head is not currently aware of future investment plans.

¹ <https://www.north-norfolk.gov.uk/media/8929/c41-paper-4-infrastructure-position-statement-reg-18.pdf>

Appendix 3: Healthcare in Hoveton

From a healthcare perspective, it is understood there are three main considerations:

1. The physical capacity to see patients – i.e., the buildings.
2. The clinician capacity: The ability for the practice to continue to attract good quality staffing to cover the workload.
3. The patient mix.

Response from the Practice Manager (December 2023)

“The Hoveton and Wroxham Medical Practice can only manage the additional suggested housing if the quality of care can be maintained so that quality staffing can be attracted to the practice.

We require the Rackheath site to be built to allow for additional capacity at the Hoveton site.

We require affordable housing to attract a good population mix which includes affordable housing for workers in the healthcare system who struggle to find affordable housing in the local area.”

Appendix 4 - Water Infrastructure & Environmental Impact

In respect to the deliverability of the site allocation HV01b in Hoveton, the NPPF maintains the presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site.²

As NNDC point out Hoveton is situated close to the river Bure. As such, given the directional flow of the river, NNDC maintain that the impact of any development in Hoveton would need to consider the integrity of the habitats site protected by National Nature Reserve, Ramsar; Special Protection Area (SPA); Special Area of Conservation (SAC) and; Special Site of Scientific Interest (SSSI).³

In 2019 a speculative planning application for site allocation HV01b from Persimmon Homes was submitted to NNDC.⁴ When the Habitats Regulations Assessment [HRA] report was produced (Feb 2021), the test of likely significant effects on the integrity of the habitats from the proposed development at HV01b were considered. The HRA report maintained that, without mitigation, additional pressure from the development had the potential to contribute to the surcharging of the existing foul sewer network. Flooding, and potential discharging into the river Bure were likely to have a significant effect from the project alone, therefore the qualifying features of the Broads SAC cannot be ruled out.⁵

² NPPF paragraph 188 <https://www.gov.uk/guidance/national-planning-policy-framework/15-conserving-and-enhancing-the-natural-environment>

³ <https://www.gov.uk/guidance/national-planning-policy-framework/15-conserving-and-enhancing-the-natural-environment#para175> (p.10).

⁴ Planning Application Number PF/19/1659

⁵ Specifically, the effects, pressure and/or threats impacting on water quality from phosphates or other pollutants as a result of: -

- the foul water generated from the new development that will be within the catchment of the Belaugh Waste Recycling Centre which discharges the treated effluent upstream of the Broads SAC, Broadland SPA/Ramsar and the Bure Broads and Marshes SSSI.
- the topography of HV01b not all plots could attain gravity feed into the new foul water developments network.
- the new developments network would connect to the foul water drainage system of the adjacent housing estate (not adopted).
- the new and unadopted estates would then feeds into the existing foul water network of Anglian Water via a manhole at Grange Close.
- the integrity of Anglian Water's existing foul water network was itself subject to ongoing flooding and network capacity issues due to surcharging during intense storm evens and high river levels.
- the capacity issues within the Hoveton network including the Riverside sewage pumping station. (The capacity issues were potentially due to the structural condition of the sewer network and/or ingress of surface water flows via direct and indirect connections).

Dispersal of foul water into the river Bure catchment during Storm Event Related Surcharge is a matter of public record.

In respect to Belaugh Waste Water Treatment Plant [permit number AW4TF351], the plant has discharged into the river Bure: -

- In 2022 - 29 times for a total of 167 hours⁶
- In 2021 this figure was 96 times for a total of 1749 hours.⁷

Even without further development proposed for HV01b, the pressure and environmental impact at the current level of housing in the Belaugh catchment, is unacceptable.

In addition to the pressures of untreated effluent during storm related events, there will also be the extra foul water generated from the proposed 190 dwellings at HV01b. Foul water will drain from upper Hoveton and will be pumped for treatment at the Belaugh Water Recycling Centre (WRC) operated by Anglian Water (AW).

The consequences of this additional flow must be understood in the context of Anglian Water's 2019 position statements where it is stated that: -

- Anglian Water have identified operational risks requiring the specific measure of a **Catchment Strategy**.
- Implementing a [undefined] Catchment Strategy will take time.⁸
- Without the implementation of a Catchment Strategy Anglian Water require new developments in Hoveton to provide additional **Onsite Drainage Scheme**.⁹¹⁰¹¹

An Onsite Drainage Scheme for HV01b was proposed and considered by NNDC in the speculative planning application from Persimmon under PF/19/1659.

⁶ Rivers Trust website

<https://experience.arcgis.com/experience/e834e261b53740eba2fe6736e37bbc7b/page/Investigate/>

⁷ River Trust website

<https://experience.arcgis.com/experience/e834e261b53740eba2fe6736e37bbc7b/page/Investigate/>

⁸ The Hoveton foul water network is under such stress that it fails to prevent regular foul water escapes. This is placing residents' health, property and the environment at unacceptable risk, particularly during periods of high river levels or heavy rainfall. In wet periods, Stalham Road already suffers surface water flooding to the extent that surface water flows through to the lowest points nearby, causing flooding of roads and ingress into the foul water network. This has happened multiple times. There are well documented wider sewer flooding and raw sewerage escape problems in Meadow Drive and Grange Close and there are also other areas of Marsh Rd and The Rhond which suffer regular loss of downstairs ablution facilities in rainy periods. Homes affected already experience raw sewage in gardens and roadways by their property and when it is raining, they live with the constant fear of sewage flooding into their homes.

⁹ Wild Frontier Ecology Report Item 6.2.3 – PF/19/1659 Planning Application. NNDC planning portal.

¹⁰ Measures consisted of an onsite drainage scheme that employed metering and capacity storage to identify the periods of high river levels which would hold back foul waters from the development from the foul water system.

¹¹ Ecological Assessment Report Wild Fronter – Item 6.2.3 – NNDC Planning Portal PF/19/1659 page 21 of 35.

The mitigating measure for the onsite drainage strategy relied on storing and holding back the flow of foul water (max 24 hours) so that during intense storm events and/or time of high local river levels the existing sewer network is not overloaded. However, the HV01b Onsite Drainage Scheme was not supported by NNDC. Reports supporting NNDC's position to refuse the planning application highlight that the implementation and effectiveness of the onsite drainage scheme's mitigation was contrary to case law.¹²

Returning to NNDC's main modification submission under ex006. The request for modification to HB01b is supported by an Addendum to the Habitats Regulations Assessment. It is believed that this is an attempt to support the requested modification to policy CC13. However, Hoveton Parish Council believe that without required mitigation measures being properly defined and appropriately assessed, the adherence to policy CC13 cannot be met.

Further, the presumption in favour of sustainable development cannot apply as further development in Hoveton is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects).¹³

In addition to the uncertainty around an onsite drainage strategy, other offsite measures to effectively deliver foul water from the new development to the Belaugh Waste Water Treatment have been proposed. This includes a proposal by the developer who seeks to lay a 2k sewage pipeline. This additional infrastructure will need to cross a railway line and the main gas pipeline from the Norfolk coast. Despite these considerable logistical and technical challenges, the developer has suggested that their proposal can be delivered at just £600,000.

Hoveton Parish Council are not convinced that what is being proposed will be effective or can be implemented as there is insufficient information that what is being proposed could be achieved both in practice and within costs estimates quoted. Further the proposal does not address the existing infrastructure issues that continue to affect the rest of Hoveton.

Putting the question of effectiveness and deliverability of a new 2km pipeline aside, whatever pumping means is proposed to deliver the foul water to Belaugh there remains the question of headroom capacity for the treatment of raw sewage at Belaugh Waste Water Treatment plant from HV01b.

¹² This is evidenced in Feb 2021 HRA where it is argued in the Wild Frontier Ecology report conclusion relies on the implementation and effectiveness of mitigation factors designed into the drainage strategy. NNDC argue that this is contrary to case law (People of Wind and Peter Sweetman v Coilite Teoranta where it is ruled that migration can only be taken into consideration as part of an appropriate assessment into the effects of the project if a likely significant effect cannot be ruled out.

¹³ NPPF paragraph 188 <https://www.gov.uk/guidance/national-planning-policy-framework/15-conserving-and-enhancing-the-natural-environment>

Determining sufficient capacity has been historically tracked in emails with Anglian Water between 2019 and 2023.

Email	Belaugh Capacity PE	Receiving Load PE
18.1.19 ¹⁴	10,178	9,817
14.12.23 ¹⁵	10,000	9,196

As Persimmon, the applicant for HV01b in 2019, were advised, ‘capacity cannot be reserved at waste water treatment plant and available capacity can be reduced at any time¹⁶.

Further, in 2019 Anglian Water also advised that *‘growth projections indicate that capacity limit at Belaugh could be breached by the year 2027 and so investment may be required at Belaugh WRC during the next AMP period and is therefore has been included in our business plan (submitted to OFWAT) but we will only invest there if growth happens as we expect.’¹⁷*

Consequently, capacity in the water recycle centre at Belaugh is set to breach in 2027. However, investment to increase capacity at Belaugh is dependent on development growth in the catchment area.

Growth and capacity at Belaugh were also a concern of the Local Authorities who co-created the GNLP. In the final draft of ‘GNLP Water Cycle Study’, published in January 2021, the future lack of capacity at the Belaugh WWT plant was identified. The GNLP study names Belaugh WWT as one of the thirty-six WWT plants that will be impacted from exponential growth from the greater Norwich growth triangle.

For Belaugh WWT the GNLP study assumes growth of 230 dwellings for the GNLP area. The GNLP further assumes growth of 109 dwelling numbers for the NNDC area. With both local authority areas totaling 339 dwellings, the head room capacity at the waste-water treatment plant at Belaugh is left with 14% max growth capacity.

Belaugh is identified as the smallest headroom across the 36 WWT impacted. Setting this fact in the context of NNDC’s new Local Plan for Hoveton (HV01b), this would mean that NNDC dwellings could only increase by only 13.5 dwellings onto top of the assumed 109 dwellings before capacity at Belaugh is reached.

¹⁴ Just Arnold writes, From the capacity tool database and following a ‘gold’ standard process assessment the current assessed capacity of Belaugh WRC is 10,178pe, and the current connected total population (resident + non resident + trade) is 9817pe.

Growth projections indicate that the capacity limit at Belaugh could be breached by the year 2027 and so investment may be required at Belaugh WRC during the next AMP period and has therefore been included in our business plan (submitted to OFWAT) but we will only invest there if the growth happens as we expect.

¹⁵ *Andy Payne - 14.12.2023 – Anglian Water*

¹⁶ AW/06/03/19) HRA Report PF/19/1659, February 2021, page 15.

¹⁷ Email Anglian Water to Kerry Walker quoting Justin Arnold 18.1.2019

Conclusion

In conclusion, capacity issues exist for the Water Recycling plant for the Hoveton Catchment area.

Anglian Water acknowledge that capacity in the water recycle centre for the Hoveton catchment is set to breach prior to the HV01 site in Hoveton being developed.

Therefore, expanding capacity at Belaugh is a necessary mitigation measure prior to growth.

It is also concluded that currently there is already an unacceptable level of foul water already being dispersed into the River Bure as Storm Event Related Surcharge.

Mitigation measures could support development. However, we are not convinced that there is sufficient information available at the Plan Enquiry stage to enable NNDC to be sufficiently satisfied that the proposed measures for growth, including mitigation, could be achieved in practice.

The proposed mitigation of an onsite drainage strategy is brought into question by NNDC who have previously argued that the assessment of the impact relies upon a drainage strategy which does not accord with case law and is not legally acceptable.

Hoveton Parish Council believes there is a lack of consideration, and consultation with Broadland District Council. This is not only in respect to the capacity issues at the Belaugh Wastewater Treatment Plant but also in the implementation of the proposed 2km pipeline that is to cross two authority areas. In the haste to submit the Main Modification, what is being proposed as measures to make HV01b a viable site does not accord with the legal duty to co-operate in strategic matters under PCPA Section 33A, subsection 4 in relation to “sustainable development or use of land that has or would have a significant impact on at least two planning areas, including (in particular) sustainable development or use of land for or in connection with infrastructure that is strategic and has or would have a significant impact on at least two planning areas”

Appendix 5 – Environmental Impact - Biodiversity

The North Norfolk Sustainability Appraisal Report (January 2022) assesses the Hoveton preferred site (HV01). It is assessed against the Sustainability Appraisal (SA) objectives.

The following is an extract from the foreword to ‘Biodiversity 2020: A strategy for England’s wildlife and ecosystem services’ written by The Rt Hon. Caroline Spelman MP, Conservative Secretary of State for Environment, Food and Rural Affairs in 2010. “In October 2010 in Nagoya, Japan, over 190 countries around the world [*including England*] reached an historic global agreement to take urgent action to halt the loss of biodiversity. This agreement recognised just how important our wildlife and ecosystems are for sustaining a healthy planet and for delivering essential benefits for people.”

The strategy was intended to guide conservation efforts in England and sets the ambition to halt **overall loss** of England’s biodiversity. In the longer term, the ambition was to move progressively from a position of net biodiversity loss to **net gain**. For the period of the Local Plan we should be experiencing **net gain**.

In the report, point 20 of the Executive Summary for Planning and Development states: “Through reforms of the planning system, we will take a strategic approach to planning for nature. We will retain the protection and improvement of the natural environment as core objectives of the planning system...”

On page 268 of the North Norfolk Sustainability Appraisal (SA) Report (January 2022), 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**”. It fails to address the ‘fauna’ but the land is also used by 2 species of Bat, 2 species of deer, Hare, Fox, 22 species of birds and butterflies (details available from Hoveton Parish Council)

In the report, point 20 for Agriculture states: - “We will improve the delivery of environmental outcomes from agricultural land management practices, whilst increasing food production by, for example, reviewing how we use advice and incentives, and how we use agri-environment schemes.”

North Norfolk’s Environmental SA objective SA1 is to “...protect the most valuable agricultural land...” – but the score for this site 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 will not increase food production.

In the report, point 13 of the Executive Summary referred to an independent review of England’s wildlife sites and ecological network, chaired by Professor Sir John Lawton which concluded that “England’s collection of wildlife areas (both legally protected and others) does not currently represent a coherent and resilient

ecological network capable of responding to the challenges of climate change and other pressures.”

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 (or more) houses and a Care Home will reduce the impact on climate change. A development of this scale suggests the current score of “++” should be reduced to “0” or even “-“.

Conclusion

The Overall Conclusion for the Environmental impact for the 6 SA objectives for Hoveton is stated as “Scores neutral” in the draft NNDC Local Plan.

However, 2 scores are unknown, 2 are negative, one is neutral and 1 is questionable.

This indicates that the North Norfolk Local Plan allocating HV01 in Hoveton as a site for residential development is not consistent with national policy and is therefore not sound.