



Planning Consultation Response from Hoveton Parish Council to Planning Application PF/19/1659

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 views gained from a public meeting held on 11th March (minutes from which are separately available).

Hoveton Parish Council STRONGLY 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 150 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 Council's 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.**

While it is understood that planning decisions are taken on principles of development and the identity of applicants, it should be noted that there is local disquiet that conditions and undertakings made in respect of Brook Park phase 1 have not been complied with by this developer. Local perception is that NNDC is incapable or unwilling to take enforcement action. There is a consequent lack of trust concerning the ability or willingness of this application to comply with planning conditions.

In such circumstances, it is legitimate to require that the planning authority ensure that, so far as possible, conditions are clearly articulated and kept to a minimum. The Parish Council also asks that where possible, Section 106 agreements be used which will allow NNDC to retain control of responsibility for completing works essential for the long term viability of the development.

9. Next Steps

I trust we have provided sufficient information regarding Hoveton Parish Council's response to this application, but should you require any further information or explanation please do let us know.