



14th February 2024

NNDC Local Plan - Response from Hoveton Parish Council (HPC) to the comments of Rural Solutions in respect of our points made on the Provision of Drainage Infrastructure

We are grateful for an opportunity to respond and for us to outline our justification for our comments over Drainage Infrastructure in advance of tomorrow's discussion.

Responding to the Rural Solutions/FW Properties (FWP) comments:

Costs of a new pipeline

Please refer to page 132 of Ex016 document within the Examination Library, where Royal Haskoning DHV maintain the cost of installing a new connection is estimated to be around £1,146,500 per km of pipeline. This figure was itself derived from the Anglian Water (AW) Developer charging arrangement 2022-23. Using this costing basis the pipeline proposed by FW properties would over £2.2million. Further, the technical viability of this pipeline is questionable as FW Properties (FWP) costing is based on a 90mm pipe carrying 100m³ per day over 2km. There would be a significant pressure drop at this capacity, therefore requiring a pumping station to deliver this level of flow. Royal Haskoning estimate a pumping station cost to be £250k with ongoing operating costs.

We also benchmarked this cost against other similar length pipelines constructed by AW themselves. These pipelines are all costing in excess of £1m per km, and they will not all face the same challenges of traversing railways, roads and major infrastructure pipelines.

Our concern is actually not with the cost of the pipeline, but with the risk that additional costs in addition to the figure being estimated would impact later on the funding available for other necessary local infrastructure or lead to pressure to vary types/ numbers of properties being built on site. This is a risk we suggest is increased with a larger site, as has been more recently put forward as a possible modification.

Capacity at Belaugh

There are also two aspects of capacity. Firstly, the hydraulic capacity or capacity to handle volume flow and secondly, the treatment capacity which is the quality of the discharge effluent. Both aspects need to be considered. FWP's 13.2.24 submission to the Examiner discusses only hydraulic capacity and not treatment capacity. It needs to be confirmed that there is both hydraulic and treatment capacity.

Our figures for capacity at Belaugh were obtained from the GNLP Water Cycle Study, dated 2021, page 70 onwards. See:

https://www.gnlp.org.uk/sites/gnlp/files/2021-11/Greater%20Norwich%20Water%20Cycle%20Study_Final%20Version%20March%202021.pdf

The total figures for available headroom may have been similar to those provided by Rural Solutions/ FW Properties (FWP) yesterday, but this has failed to consider that the headroom needs to be spread across several building developments, some already in progress, including others in Hoveton, and also needs to be split between developments across Broadland DC and NNDC, as explained in the GNLP.

Growth and the capacity at Belaugh were a concern of the Local Authorities who co-created the GNLP. In the final draft of 'GNLP Water Cycle Study', 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 then 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 was left with 14% max growth capacity. Belaugh was identified as having one of the smallest headrooms across the 36 WWTPs considered.

This might be argued as a sound reason for a development smaller than that being considered as a Plan modification.

Investment plans for Belaugh

Investment plans for Belaugh WWTP have come from the Anglian Water's Drainage Wastewater and Drainage Plan (DWLP), date May 2023, page 56. See: <https://www.anglianwater.co.uk/about-us/our-strategies-and-plans/drainage-wastewater-management-plan/final-plan/>

Capacity at Belaugh WWTP is nearing the Technical Achievable Limit. Tanker lorries already transport untreated sewage to Whitlingham daily. Alongside other Broads WWTPs along the Bure, the existing WWTP plant is also unable to properly function in flood conditions. Data provided to us by the chair of Belaugh parish council suggest that Belaugh has been subject to excess capacity releases that breach the discharge limit.

Belaugh funding to address Nutrient Neutrality is also not yet secured. There is currently no firm guarantee of increased capacity at Belaugh WWTP or any confirmation that what is proposed for Nutrient Neutrality treatment at WWTPs can be delivered soon.

The FWP 13.2.24 submission to the Examiner discusses criterion 8, as updated at MM A5.11. It also needs to be clearly agreed that condition 9 '*enhancement of sewage infrastructure that should be undertaken prior to first occupation to any dwelling*' includes the proposed modification to BWTP, specifically that this upgrade should be completed and operational prior to first occupation. We propose that Clause 9 should therefore be modified in the same way that clause 8 has been modified to be explicit with regards to what works need to be completed prior to first occupancy.

Further work is needed. NNDC have not yet seen a Drainage Strategy and advise 'all we [NNDC] have is the suggestion that in order to deliver the policy requirement it will be necessary to provide a direct connection to Belaugh and that this will come at a cost of £650k'

Alongside the suggested change to 'clause 9', this uncertainty may point to a later timing for any HV01 development in the NN Local Plan also being a sound idea.