



Local Plan - Response from Hoveton Parish Council (HPC) to the questions raised by Examiner in respect of Hoveton

Matter 1 - Duty to cooperate, legal requirements, habitats assessment & plan period

Hoveton Parish Council strongly objects to the North Norfolk draft Local Plan currently under examination and considers it entirely unsound in its approach to our village, Hoveton. The Council understands and supports the need for additional housing, but the draft Local Plan is currently flawed and presents a serious risk on many levels.

HPC is keen to support North Norfolk District Council (NNDC) in putting in place an adopted Local Plan for our District, especially as not having a plan locally raises concerns for us about being able to steer future sustainable development occurring in our area.

We also understand the requirement for additional housing to be provided within the District, albeit demand is also impacted by this being an area with amongst the highest percentages of holiday homes and second homes nationally.

It is therefore a shame to be raising concerns at this late stage, via the Examiner, but this has proven necessary. The Local Plan document under examination (and already consulted upon) appears to have been made obsolete with changes being made in policies, the increases in both dwelling numbers and land allocation proposed, and with the late addition of the required documentation.

Key points

- There has been no consultation on the emerging expanded housing site/ numbers allocation for Hoveton, whether of area designated or the numbers of housing units now being proposed. In fact, we have only become aware of the larger size of site/ numbers of properties proposal in November 2023 as the Proposed Main Modifications document and Proposed Minor Modifications document have never been shared with us, nor with anyone else (outside of NNDC and the Examiner) so far as we can tell. We fail to understand how a previous version of the plan can be consulted on and then 'torn up' with such significant changes now being submitted for

examination. Hoveton Parish Council responded during the consultation period, but much of that response is now inappropriate. Every other consultee will, no doubt, be in the same situation – if they even know that the revisions have been suggested.

- The main issue surrounding HV01/B is viability with various attempts to make an unviable site appear more so. In order to ensure that the site remains viable, it has grown by **65%** since the publication of the Plan in January 2022. The scale of the development is now forcing other problems to the surface including the need for a 2km sewerage pipeline which needs to cross a railway line, two roads and the main gas pipeline from the Norfolk coast at Bacton. Despite these considerable challenges, the developer has suggested a cost of just £600,000. Hoveton Parish Council believes this to be entirely unachievable. Linked to this is the assertion by NNDC that S106 monies could be used to pay for the pipeline which impacts on other required infrastructure funding. The problems associated with the site appear to ensure that it remains unviable and without any real chance of ever becoming viable.
- The site size/ housing numbers now being put forward for countryside to the north of our village appears similar to those in the Persimmon application which was so robustly refused by NNDC in 2019. Many of the objections raised by NNDC officers to the earlier Persimmon application, on pages 12 to 36 of the NNDC refusal (PF 19 1959 OBJECTION) and woven into our Hoveton Parish Council (HPC) response ([link here](#)) also apply to site HV01/B as now being promoted by NNDC, on behalf of the developer, as part of the draft North Norfolk Local Plan.
- The impact of development in Hoveton on other services has not been properly considered. For example, the capacity of the Anglian Water Belaugh pumping station has not been properly determined - this facility already discharges into the River Bure regularly. This raw sewage flows back through Hoveton and Wroxham with ongoing environmental impact at our parks and open spaces. Our schools and surgery are already at capacity. Our roads (and bridge) already require considerable investment.
- Hoveton Parish Council does not believe that NNDC's 'Duty To Cooperate' has been taken seriously. There has been no credible liaison with other authorities such as the Broads Authority, Broadland District Council and the Parish Council. The Greater Norwich Local Plan appears to have been entirely overlooked with Broadland District Council making it plain that the North Norfolk Local Plan is at odds with it. The Broads Authority has brown field sites (the Waterside Rooms, which has been empty and derelict for over 30 years) which would better suit the needs of the village but, again, the lack of consultation has failed to identify this.
- Designations of our village (deemed as a town in the Local Plan) are seemingly being driven by wanting to deliver the target total number of houses across the District, rather than following from an evidenced consideration of the needs of our village. Hoveton is certainly not a town and, with Roys department store having such influence in so many ways, would likely never be able to provide the services required to be classified as such.
- Assessment of the impact of traffic through our transport bottleneck (the ancient bridge between Hoveton and Wroxham) is woefully lacking. Traffic volumes are already unsustainable, and set to worsen with significant (recent and planned) developments

in Hoveton, Stalham and the surrounding area adding to the burden. We are mindful of the GNLP decision to not allocate housing to Wroxham, our conjoined community, due to the location being within the Broads national park, traffic concerns due to our ancient bridge bottleneck and the existing congestion along the Norwich Road. Broadland District Council has represented separately about this.

In our view, the optimum approach for the Broads area is to build the required new houses south of the bottleneck river bridges, where most of the employment opportunities exist, and where there are transport links provided by the Broadland Northway/ NDR. We believe that the North Norfolk Local Plan should instead focus development in towns such as Fakenham and Holt, where the impact of the increased demands on services and infrastructure can be more easily managed and provided by the District Council.

We are also mindful of the legislative changes promised to the formula used for calculating housing numbers across every district including the need to build at inappropriate locations such as is being proposed at Hoveton. We are hopeful that this will enable a better solution in our particular area.

In our view, much of the Plan which relates to Hoveton lacks the necessary credibility. We believe that NNDC must now begin this process again – and ensure that it is done in the correct way.

Responses are now provided to the initial questions raised in respect of Hoveton (or generally) by the Examiner.

5.5.1 Are the detailed Settlement Boundaries for Hoveton, and the boundaries of the various Policy Area Designations (listed in paragraph 9.1.6 of the plan) suitable and justified given their policy function?

1. The area designations used for the village of Hoveton change at points within the draft Local Plan, seemingly to help support the settlement proposals being suggested. Hoveton is undeniably a village, but is being described as a 'Small Growth Town' in Section 13 of the LP, but then in Section 13.0.1 it is further described as a 'Conjoined Village' with Wroxham. In Section 13.0.4, Hoveton becomes a 'small growth town' with a 'medium town centre' This description of a 'medium town centre' in the current draft Local Plan is contrary to the retail hierarchy in NNDC's 'Examination Document Library Reference H3 'North Norfolk Retail & Main Town Centres Uses Study: Final Report, section 4.7' which was used to inform the plan. In Section 13.0.5 of the LP, the status of Hoveton is, again, that of a village.
2. Hoveton's boundary runs adjacent to Wroxham's, our 'conjoined village'. However, Hoveton and Wroxham are unfortunately located in different districts. As a result, Wroxham falls into the Greater Norwich Plan (GNLP) area. NNDC has seemingly failed to plan for the future of our local community in co-operation with Broadland District, as part of the GNLP process or with the Broads Authority, the latter having planning responsibilities and jurisdiction within our village, With reference section 26 and 27 (p10) of the NPPF: *'In order to demonstrate effective and ongoing joint working, strategic policy-making authorities should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these. These should be produced using the approach set out in national planning guidance and be made publicly available throughout the plan making process to provide transparency. "*
3. NNDC shares planning responsibility for Hoveton's village centre with the Broads Authority (BA). To date, there has been no real attempt for NNDC to work with the BA, nor the Parish Council, to create a village plan. There have also been delays in the development (and enforcement) of derelict brown field properties in the village centre. For example, a large unsightly building has sat undeveloped for 30+ years in Station Road. This arguably remains the best located site for elderly accommodation, as opposed to use of a 'greenfield', edge of village location (HV01/B). We suggest NNDC work with partners to develop a shared vision/ strategy for the Hoveton/ Wroxham 'conjoined' villages. Partners such as the Broads Authority and Hoveton Parish Council, and Wroxham Parish Council would be keen to contribute to such an approach. This would better address the lack of opportunities for supporting sustainable growth with mixed use development sited in the existing commercial areas and retail areas within the area.
4. In summary, the NNDC plan needs to be consistent in how it designates the status of Hoveton and also in its policy function for conjoined village status. More work is needed when considering the opportunities for development within the village boundaries and how these plans are impacted by the plans for surrounding areas. Plans made should involve the key partners - both Parish Councils, the Broads Authority and Broadland DC.

5.5.3 Land East of Tunstead Road (HV01/B)
Standard Questions a) to k)

5. The further extension of the site allocation (both of area or of housing numbers) as being now mooted in document *ex003 responses to the inspectors' initial clarifications* is of huge concern. The proposals now are at a level which the Parish Council, nor other interested parties, were previously aware of being proposed, let alone given chance to comment on.
These increases are:
Area - 6.4ha to 10.6ha = 65% increase
Housing numbers - 120 homes to 150 homes = 25% increase
6. There has been no consultation on either the Proposed Main Modifications document nor the Proposed Minor Modifications documents. As such, the Parish Council is only recently aware of the larger size of site/ numbers of properties proposal. The site size/ housing numbers now being put forward for the countryside to the north of our village will now be similar to those for the rejected Persimmon application, with only some marginal adaptations, such as the building of the new sewer (mainly for the benefit of the new development) and the retention of a hedge along the Tunstead Road. Most of the objections raised by NNDC officers to the earlier Persimmon application, on pages 12 to 36 of the NNDC refusal (PF 19 1959 OBJECTION) and also woven into our Hoveton Parish Council (HPC) response ([link here](#)) would also apply to the scheme now being promoted by NNDC, on behalf the developer.
7. Geographically, Hoveton is on the edge of the recently produced Greater Norwich Local Plan (GNLP) area. Within this, further development in our conjoined village of 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. Please note, around 70% of all new jobs created in Norfolk will be within the Greater Norwich Local Plan (GNLP) area, rather than locally within the NNDC boundary. The GNLP decision not to allocate further housing in Wroxham in the GNLP was due to infrastructure constraints, notably highways, with the A1151, also running through our villages, being a key reason.
8. We do not believe that it is possible to conclude that the current NNDC plan is sound or legally compliant. In particular, we do not consider that the NNDC plan is justified, effective or consistent with National Policy. For example, we do not believe NNDC have currently complied with the requirements of the duty to co-operate. Reassuringly, there is similar concern being raised by Broadland District Council (BDC) - the extent of the GNLP / Broadland DC objection to the NNDC Local Plan can be seen within NNDC's own summary of responses to its local plan.
9. Environmental issues - Drainage and Air Quality: Hoveton Parish Council believes that what is being proposed for our village does not accord with NNDC's strategic aims [2.4.1 (1)] in delivering climate resilient sustainable development. The plan's proposals for Hoveton do not comply with policy CC1 as NNDC has failed to consider the growth impact of the 4000 houses locally at Rackheath under the GNLP. It has also failed to consider the 53 dwellings in Hoveton built outside the site allocations of NNDC's existing Local Plan. NNDC fails under CC1 sub-section (g) where the aim is to

minimize the impact that further development will bring to Hoveton in its new Local Plan.

10. Whether it is the employment of an onsite drainage strategy supporting development or offsite mitigations to address environmental impact, Hoveton Parish Council is not convinced (even with NNDC's HRA proposed modification to policy CC13 providing for mitigation to support development) , that there is sufficient information available to enable NNDC to be duly satisfied that the proposed mitigation measures could be achieved in practice.
11. In addition, the legality of the proposed mitigation is brought under scrutiny by NNDC itself who argue that the assessment of the impact of HV01b relies upon a drainage strategy which does not accord with a precedent set-in case law. This brings the viability of the allocation site into question.
12. The issue of capacity at Belaugh is also brought under the spot light by the GNLP whose water studies have shown that there is no capacity for sustainable growth planned at the level of dwellings for HV01b.
13. Under Part IV of The Environment Act 1995, NNDC also has a statutory duty to examine and manage local air quality within its area. An assessment must be undertaken in accordance with the air quality objectives set out in the Air Quality Strategy published in 2000, the Air Quality (Amendment) Regulations 2002 and the Local Air Quality Management guidance issued by DEFRA.
14. Hoveton Parish Council does not believe NNDC is minimizing air quality impact for Hoveton. As part of the agreement to build 150 dwellings in Hoveton for Brooke Park phase 1 an air quality monitoring a payment of £12,000 was written into the S106 document S106/53/17 by NNDC, but HPC believes this was never received, or used
15. In 2016 NNDC's draft Sustainability Appraisal Scoping Report states that in 2013 a Nitrogen Dioxide hotspot was identified in Hoveton due to the high levels of traffic and congestion in the village centre. It was maintained that there 'is potential for Nitrogen Dioxide levels to increase with an increase in population, vehicles, and traffic. Since NNDC's 2016 Scoping Report two additional housing developments have been given approval in Hoveton. Tilia Homes (28 dwellings) and Church Fields additional 25 dwellings (2017). The draft Local Plan, in Section 3.13, identifies a peak in Hoveton during 2019. Clearly, this was not an isolated incident at the hotspot of Wroxham Bridge and has not been followed up. Nitrogen Oxide does not sit statically in the air. The air pollution is pumped out and sits over two districts at the pinch point of the very congested narrow ancient bridge. However, the nearest data monitoring point for air pollution is 0.2 miles away from Hoveton at the Wroxham library in the Broadland District Council area. The Defra Policy Guidelines (PG09) advise, '*If a local authority identifies a risk of air quality objective exceedances at any time during the reporting years, it should proceed to carry out a Detailed Assessment to formally identify the need to declare an air quality management area and its appropriate size and location.*' NNDC does not at any point identify in its new Local Plan that there is a need to carry

out the detailed assessment as required by Defra. Moreover, as at July 2023, NNDC had failed to secure the £12k from air quality monitoring for Hoveton set out in the s106 agreement with Persimmon. Historically, NNDC has been failing to manage its air pollution monitoring. There has also been no mitigation or consideration to minimizing issues of air pollution exacerbated by the development proposals for Hoveton within NNDC's new Local Plan

16. In summary, Hoveton Parish Council does not believe that what is being proposed for Hoveton accords with NNDC's strategic aims [2.4.1 (1)] in delivering a climate resilient sustainable development.
17. Environmental Impact: Biodiversity: The North Norfolk Sustainability Appraisal Report – January 2022 on page 268 assesses the Hoveton preferred site (HV01/B). It is assessed against Sustainability Appraisal (SA) objectives. The Overall Conclusion for the Environmental impact for the 6 SA objectives for Hoveton is stated as "Scores neutral". However, 2 are unknown, 2 are negative, one is neutral and 1 is questionable. This indicates that the North Norfolk Local Plan allocating HV01/B in Hoveton as residential is not consistent with national policy and is therefore not sound. Please refer to appendix 5 for more information about the concerns being outlined here.

Concluding comments

18. This response has had to be prepared over a short timescale during December. We hope we have provided sufficient detail regarding Hoveton Parish Council's response to the draft Local Plan here, but should you require any further explanation, we are immediately contactable via our Clerk.
19. We want to be helpful, constructive and usefully contribute to the Examination in January/ February. We are grateful to have an opportunity to explain our response here and to answer any questions which arise. We are very mindful of the strength of local resistance to this scale of development in Hoveton, as was evidenced in the 100 or more objections to the earlier proposals from Persimmon.
20. An Appendices document 'HPC NNDC LP Examination – Appendices' is also provided in support of our responses to the questions raised by the Examiner.

Ben Bethell
Parish Clerk and RFO
For and on behalf of Hoveton Parish Council
Tel: 07572 349600
Email: clerk@hoveton-pc.org.uk

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