



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

Matter 2 – Spatial strategy, criteria to define settlement boundaries, small growth villages

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?

Designations for Hoveton

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. The original intent for the LP was for Hoveton to be considered as a *Large Growth Village* where the village would maintain '*a wider role as a service centre in meeting the needs of residents and those of a wider rural hinterland*'. This changing settlement hierarchy status throughout the plan does not accord well with the requirements of NNDC's Spatial Strategy SS1. The inconsistent classifying of the settlement status results in the distinct characteristics and needs of the village of Hoveton becoming less clear. This weakens consideration of how future development should tackle the significant social, economic, and environmental challenges facing Hoveton.
3. The shifting nomenclature for Hoveton raises concerns about the suitability and justification of both the Settlement Boundaries being proposed for Hoveton as well as the various Area Designations. Boundaries of the various Policy Area Designations need to be re-assessed for their suitability and consistency, given their importance for planning purposes. Hoveton's settlement status should be as a '*Large Growth Village*' as was proposed by NNDC's Local Planning & Built Heritage committee on August 16 2021.
4. 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.*' "

5. With Hoveton conjoined with Wroxham, the position of Hoveton in NNDC's local plan should be treated in much the same way as Wroxham is treated in the Greater Norwich Local Plan. Under Section 5.60 of the GNLP, for Wroxham, the GNLP states: - "*there are no new allocations proposed Traffic constraints and Wroxham's proximity to the Broads restricts further growth.*" Constraints in the GNLP recognised for Wroxham equally apply for Hoveton. Like Wroxham, Hoveton would have been more correctly recognised as a service village with limited growth under the Settlement Hierarchy. Both these communities face similar problems, including regular flooding due to their Broads location, which is making the only main road through our villages increasingly impassable (see: [link here](#)).
6. Within Hoveton and Wroxham, similar businesses operate along the two sides of the River Bure, albeit that more of the retail premises are situated on Hoveton's side. These businesses are mainly serving the leisure and tourism sectors (boating/ fishing etc.) As a result, the description of the '*Medium Town Centre*' in the draft Local Plan is incorrect and contrary to the NNDC's 'Examination Document Library Reference H3 'North Norfolk Retail & Main Town Centres Uses Study: Final Report'. In reality, Hoveton is a village, most fairly considered as having a village centre, as much of the village exists only as a tourist destination, with mostly tourist dependent businesses. Hoveton is a village which is home to Roys who maintain they operate the 'world's largest village store.'
7. For most infrastructure needs, the communities of our two villages must be considered together, such as for ensuring roads, schools, water/ sewage, air quality, flooding defences, health centre infrastructure are adequate. The current lack of adequate provision is well documented. For illustration, please refer to both the earlier NNDC objections to the speculative approach from Persimmon Homes for a similar size development at the same location in our village, as well as in the response from the parish council - see NNDC refusal (PF 19 1959 OBJECTION) and also the Hoveton Parish Council (HPC) response ([link here](#)). See also the attached appendices provided with this response, for infrastructure assessments as at December 2023.
8. Arguably, our two villages suffer from being on the very edges of our respective districts, with investment typically being channelled more to the larger, more central communities in each District.

9. We have been asked to look at the Local Plan for Hoveton in terms of the boundaries listed in policy 9.1.6, for the Town Centre. It is stated on page 10 Section 2.23 that *'Policy SS11 – Hoveton: No retail development is identified'*.
10. Evidence used to support the new Local Plan indicates that the village of Hoveton actually has the lowest retention rate for local shoppers with 78% choosing to shop in Norwich, according to the North Norfolk Retail Study <https://www.north-norfolk.gov.uk/tasks/planning-policy/retail-and-main-town-centre-uses-study/> (section 4.35). NNDC's study says *'food store provision is adequate, although choice is limited'* The NNDC report also states that Hoveton has the third smallest retail provision in terms of floor space in the District, with nearly all of this floor space provided by Roys retail outlets. With many residents already taking trips to Norwich, an expanded village would be further under provided for.
11. We need better consideration of what is appropriate to enhance our village centre and help deliver a vision for the future. The village centre has a reliance on a major retailer whose level of land ownership has the ability to control retail growth. For the village centre to grow sustainably, and retain shoppers locally, Roys will need to expand its commercial foot print onto its car parks and/or sell land to other commercial retail developers. This would appear to be counterproductive for Roys as a business and therefore highly unlikely.
12. 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.
13. 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.

5.5.2 Is the housing allocation for Hoveton the most appropriate when considered against reasonable alternatives in the light of site constraints, infrastructure requirements and potential impacts?

14. More of the housing development for our village could be achieved from in-filling on the existing brown field sites in our village, This would remove or reduce the need for the extension of the village's development boundary out into farming land/ open countryside. This would include the development of the former 'Waterside Rooms' in the village centre, and the re-purposing of other commercial buildings no longer required due to the declining demand for cruiser boat maintenance/hire. A large development is inappropriate given the major infrastructure restrictions and deficiencies within our village, and is also of detriment to the character of the village, as a Broads tourist destination.
15. Of particular concern, would be an unwarranted extension of the development (whether in area or housing numbers), as being mooted in document *ex003 responses to the inspectors' initial clarifications*. The numbers now proposed here are at a level which neither the Parish Council, nor any of the other interested parties, have been previously aware and upon which we have not previously been consulted. In both size and in housing numbers this proposal appears to be in excess of those already rejected in the Persimmon application. Please refer again to the earlier NNDC objections to the speculative approach from Persimmon at the same location, as well as the response from the parish council (NNDC refusal (PF 19 1959 OBJECTION) and the HPC response ([link here](#))).
16. More is provided later on the particular infrastructure concerns for our village, but it is also the case that additional housing would necessitate additional and updated community facilities. The LP is a vision for the coming decades, and, in that timescale, significant change will be needed in order to ensure that the current community buildings remain fit for purpose. The existing village hall and community centre are both aged buildings which were not built to modern standards. It has been recognised that a building which encompasses the facilities provided by both the current older buildings would be the ideal solution. Renovation of the current buildings is a non-starter for a number of reasons: such as layout, a roof replacement being needed, and because services such as heating, insulation and electricity cannot easily be upgraded. One possibility to be explored with NNDC would be to use part of the existing site for our two halls for the elderly persons accommodation being proposed in the local plan. This then becomes another 'brown field' option for the Local Plan.
17. In summary, a large development on the edge of our village of the scale proposed would result in an increased net burden for infrastructure locally. It is maintained that the key parts of the required infrastructure challenge the viability of the site and would be impractical to deliver for our particular location.

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

18. 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
19. 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.
20. 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.
21. Hoveton Parish Council is also very concerned about the impact of this development on our over-stretched and failing local services infrastructure and amenity provision. These concerns were previously listed in our objection to the Persimmon proposals ([link here](#)).

Extra Question 1) As part of a larger field, how has the site boundary been determined?

22. In January 2022, NNDC submitted to the Examiner its draft version of the Local Plan, with a proposal for 120 houses. Whilst a challenging housing number to accommodate in our village, this at least provided a relatively logical site boundary, with a site size of 6.4 hectares. The increased size does not appear to have been determined in any credible way.
23. HPC were not involved or consulted on the Proposed Main Modifications document and Proposed Minor Modifications documents. The need to increase the size of the site/ numbers of houses has not been explained and therefore cannot be supported. This change is being driven by a developer and is not a result of work undertaken to support the Local Plan.

Concluding comments

24. 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.
25. 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.
26. An Appendices document 'HPC NNDC LP Examination – Appendices' is also provided in support of our responses to the questions raised by the Examiner.

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