



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

Matter 5 – Places and Sites – Hoveton – HV01/B

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.

5.5.2 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?

1. Over the extended period of the Local Plan, the housing allocation of 120 units as outlined in paragraph 13.0.2 of the draft LP would appear to be at the upper limit of what would be suitable and proportionate for a village of our size. However, NNDC's Sept 2023 (ex006) submission to the examiner shows that dwelling numbers are now at 190. Any development needs to be preceded by provision of the required and necessary infrastructure investment for our village. Some of these requirements are technically challenging and will be costly and difficult to deliver in this location. However, they are essential Hoveton is to grow sustainably. These include putting in place better highways (including ancient bridge replacement, flooding alleviation etc). We need flood prevention (with flooding affecting large areas of our village) In addition, we need a whole village strategy for better dealing with sewage and its environmental impact on a European site. This includes the expansion of capacity at Belaugh Waste Water Treatment Centre and joined up strategy to delivery of foul water to the waste water treatment plant. Future development needs to go hand in hand with a remedy for fixing existing sewage infrastructure where effluent regularly rises to appear in residents' gardens, on roads etc. Other necessary infrastructure will also be needed for our schools and our health centre (at capacity and beyond) and also our recreation facilities (needing modernisation and investment). A more detailed analysis of site constraints and infrastructure challenges is provided later/ in appendices to this submission.
2. 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.
3. 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](#)).

4. 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.
5. 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)

6. 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
7. 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.

8. 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.
9. 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.
10. 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](#)).
11. Since the rejection of HV01/b being developed by Persimmon, these previously raised concerns/objections are now additionally updated by Hoveton Parish Council in the following paragraphs with further detail provided in the appendices to this response:
 - a) **Education:** both our primary and high schools are currently over capacity. Both schools are already accepting additional pupils from the early growth from the catchment falling within the GNLP area. This is set to rise. See details of current figures provided as **appendix 2**
 - b) **Highways:** The ancient monument of Wroxham Bridge is a serious pinch point, with traffic volume regularly causing extreme congestion over the bridge, and along roads in both villages. The road is also subject to regular flooding (pictures available, and can also be viewed in many local social media posts), with regularly collapsing sewers along part of its length, where built on marsh. There is no current prospect of an alternative route over the River Bure being provided. The A1151 Norwich Road / B1140 Salhouse Road mini-roundabout and the A1151 Stalham Road / A1062 Horning Road / B1354 Horning Road West double mini-roundabouts cannot accommodate any future increase in traffic flows without expensive intervention.

There is also no understanding or recognition of the additional traffic arising from the 300+ dwellings being proposed for Stalham, with additional journeys from commuters using the A1151 through Hoveton & Wroxham to access the NDR and Norwich.

Although Hoveton has a rail station and a bus service to Norwich, there will still be a large increase in road traffic as a result of an increase in commuting and general household traffic (deliveries, shopping, social activities etc). All such extra traffic has to negotiate the local pinch points with all journeys contributing to the congestion on the A1151 and the alternative route, via Coltishall.

Coltishall also has a pinch point of an ancient bridge and the route to Norwich is already being made worse by increased traffic arising from the recent further development of Stalham and of North Walsham. This would now be made much worse by the new proposals in the emerging NNDC Local Plan.

To date, there has been no significant infrastructure investment put in place to improve our local road network in our part of North Norfolk, such as was the case with the NDR around Norwich. We therefore concur with Broadland District Council's substantive concern that substantial additional growth would unacceptably increase the traffic volumes felt on our local arterial routes into Norwich.

- c) **Foul & Surface Water:** 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.

The Parish Council suggests 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 plans for development in Hoveton until suitable solutions have been put in place, and demonstrated to be effective.

Problems include the Belaugh Waste Water Treatment Plant which is using tankers weekly to remove waste and is operating at near full capacity. Waste water treatment facilities locally require considerable investment to meet environmental requirements. The lack of capacity at the Belaugh WWT plant is a constraint to development growth both in Hoveton and neighbouring villages that are in the catchment of the sewerage facility. This can be evidenced in the GNLP Water Cycle Study 2021. Belaugh WWT is named as one of the 36 WWT plants that will be impacted from growth from the GNLP. Growth assessment table for Belaugh assumes dwelling numbers of 230 for the GNLP area. Dwelling numbers for NNDC district are assumed to be 109 dwellings. With both local authority areas totalling 339 dwellings the capacity left for growth is 14%. This is the smallest headroom across the treatment plants impacted.

Setting this fact in the context of the new dwellings proposed for Hoveton would mean that NNDC dwellings could only increase by 13.5 dwellings on top of the assumed 109 dwellings before capacity at Belaugh is reached. As we know the rising number of dwellings for HV01b that NNDC are now proposing would lead to the WWT plant operating well beyond capacity.

We suggest the financial burden of implementing an improved sewage system and increasing capacity at the recycling centre should be paid for by AW, so as not to unfairly impact on other the necessary infrastructure required to be funded locally and to support the community projects needed in the village.

It may well also be that the cost of providing the additional sewer, which needs to travel under two roads, two railways and the major gas line to Bacton along its 2km length, and which also needs to cross all other pipes/ cables as well as being connected at each end, will be much higher than the current estimate of £600,000.

Hoveton Parish Council believes there has been 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. What is being proposed 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 4 provides a more detailed analysis of the challenges of capacity that appear to be faced with the future operation of AW's Belaugh Treatment Plant.

- d) **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.

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.

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.

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.

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.

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.

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. Tillia 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.

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.

- e) **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.

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

12. 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.
13. 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

14. 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.
15. 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.
16. 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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