

Home Builders Federation

Matter 2

GREAT YARMOUTH PART 2 LOCAL PLAN EXAMINATION

Matter 2 – Spatial Strategy

Issue

Whether the Plan is consistent with the Great Yarmouth Local Plan Core Strategy (CS) and if not, whether any update or departure reflects an approach that is positively prepared, justified, effective and consistent with national policy in relation to the scale and distribution of the development proposed.

Questions

1. Is the scope of the Plan, justified and consistent with national policy and does it appropriately identify “strategic policies”? Is the Plan consistent with national planning policy that expects strategic policies to look ahead over a minimum 15-year period from adoption, or is it otherwise justified in the context of the CS?

If the Council are looking to amend its housing requirement on the basis of the standard method the Council. Must also have regard to other paragraph of the NPPF that will have an impact on strategic policies. Paragraph 22 of the NPPF clearly states that strategic policies should look ahead over a minimum period of 15 years. The new policy UCS3 of the Local Plan Part 2 (LPP2) is self-evidently a strategic policy when considered against the expectations of such policies set out in paragraph 20 of the NPPF and should extend the period over which needs are considered by a further 6 years. If the Council is seeking to amend strategic policies it cannot pick and choose what elements of the NPPF it chooses to consider, it must makes amendments to reflect all those parts of the NPPF that are relevant to that policy.

2. Is there any evidence to suggest the housing market area and functional economic areas relating to Great Yarmouth Borough are now different to those identified in the CS?

No comment



3. What is the context provided by the CS in terms of the overall scale of development required for housing, employment, retail, etc? In that regard, do Policies UCS3 and UCS7 intend to align with the balance of delivering new homes with new jobs and service provision as stated in Policy CS2 of the CS? Does the scale of development in the Plan reflect that as justified by evidence?

Paragraph 60 of the NPPF recognises that the local housing needs assessment (LHNA) arrived at using the standard method is the minimum number of homes that the Council is required to deliver. PPG provides more detail at paragraph 2a-010 with regard to examples of where it would be appropriate to plan for higher housing needs than the standard method indicates. These include:

- growth strategies that will promote and facilitate additional growth;
- strategic infrastructure improvements that are likely to drive an increase in the homes needed locally
- authorities agreeing to take on unmet needs from neighbouring authorities.

The Council outline in paragraph 1.4 of the LPP2 that it has considered other influences that may necessitate an adjustment to the LHNA. These other influences include whether there are unmet needs in neighbouring areas and the need for affordable housing. However, the Council do not consider in this paragraph, or elsewhere in the plan or its evidence base, whether there are any growth strategies or strategic infrastructure, such as proposed third crossing of the Yare River, that are likely to support higher levels of demand for housing in future.

It is also important to recognise that paragraph 2a-010 of PPG in outlining the above scenarios states that councils should not be limited to these circumstances. For example, it is important that the Council maintains a sufficient supply of homes to support its aspirations with regard jobs growth. The 2013 SHMA supporting the Council's Core Strategy, and submitted in support of this plan, indicates at paragraph 6.21 that there was the need for between 390 to 410 new household per year to support jobs growth in the Borough. Whilst this evidence is more than 7 years old the Council has not seemingly changed its ambitions for the growth of the Borough within part 2 of the local plan yet it has chosen to reduce the level of housing growth to 312 dwellings per annum in the Borough below what was previously considered necessary to meet jobs growth. Whilst the economic ambitions of the Council may now have changed it is not clear from the local plan or the Council's evidence whether the amended housing growth is sufficient to support its economic growth ambitions over the plan period.

4. What is the overall spatial strategy for Great Yarmouth and the approach of the CS towards the distribution of development within Main Towns, Key Service Centres, Primary Villages, Secondary Villages, Tertiary Villages and the Countryside? Is the Plan consistent with it, as supported by evidence?

No comment

5. What scale of development is committed and is proposed in each of the settlements, i.e. housing, employment land, retail, etc? Is this consistent with the

settlement hierarchy? Does it suitably encourage the re-use of previously developed land and existing buildings?

No comment

6. Is the approach of the Plan to defining Development Limits for some villages appropriate and justified? How were the boundaries identified and what factors were taken into account?

No comment

7. Do those approaches reflect the characteristics, roles and functions of individual settlements and other areas of Great Yarmouth Borough during the plan period? Did the potential impact of visitor pressures on Natura 2000 sites have any influence?

No comment

8. Policy GSP1, amongst other things, has a permissive approach when stating that "Development will be supported in principle within the Development Limits". What are the intentions in that respect, and would such an approach be effective in circumstances where other policies in the CS and the Plan may be relevant to a development proposal? Is the Plan sufficiently clear as to what development will be permitted within development boundaries?

No comment

9. Is the restrictive approach of Policy GSP1 in seeking to prevent development outside of Development Limits consistent with national policy (particularly in terms of rural housing and the rural economy)? Is there any evidence that it would constrain the ability to meet local needs? Are the potential modifications to Policy GSP1 and the Policies Map, as set out in Document J1.2, justified and consistent with national policy?

As set out in our representations we consider the policy to be insufficiently flexible with regard to development on the edge of settlements.

Mark Behrendt MRTPI
Planning Manager – Local Plans SE and E