

Consultation Documents Update and Proposed Responses
Report by Planning Policy Officer

<p>Summary: This report informs the Committee of the Officers' proposed response to planning policy consultations recently received, and invites any comments or guidance the Committee may have.</p> <p>Recommendation: That the report be noted and the nature of proposed response be endorsed.</p>
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1. Introduction

- 1.1 Appendix 1 shows selected planning policy consultation documents received by the Authority since the last Planning Committee meeting, together with the officer's proposed response.
- 1.2 The Committee's endorsement, comments or guidance are invited.

2. Financial Implications

- 2.1 There are no financial implications.

Background papers: None

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Appendices: APPENDIX 1 – Planning Policy Consultations Received

Planning Policy Consultations Received

ORGANISATION:	Great Yarmouth Borough Council
DOCUMENT:	Consultation on the Great Yarmouth Draft Local Plan Part 2 - Development Management Policies, Site Allocations and Revised Housing Target
LINK	https://www.great-yarmouth.gov.uk/planning-consultations
DUE DATE:	30 September 2018 (although extension to after this Planning Committee agreed with GYBC)
STATUS:	Draft local plan
PROPOSED LEVEL:	Planning Committee endorsed
NOTES:	<p>This Draft Local Plan Part 2 document shows what the Council is thinking about having in terms of:</p> <ul style="list-style-type: none"> • detailed policies for planning applications • allocations of sites for development • a reduction in the overall housing target for the Borough, and a few minor updates to other Core Strategy policies • the replacement of the remaining old 'saved' policies (from the former Borough-wide Local Plan of 2001) by these new policies will replace • changes to the Local Plan Policies Map, to give effect to the above <p>Once it is completed and adopted, the Local Plan Part 2 will provide the detailed policies to help achieve the general type and distribution of development for the period to 2030, already decided by the Local Plan Part 1 (Core Strategy), which the Council adopted in 2015.</p>
PROPOSED RESPONSE:	<p><u>Comments</u></p> <ul style="list-style-type: none"> • There are many blank pages and the chapter separation pages are heavy on the use of ink if they are printed off. • 2.2.1.6 – suggest that the Broads Authority is mentioned here in that a Duty to Cooperate Agreement exists whereby GYBC have committed to deliver the entire housing need for the Borough, including that of the Broads Authority, and that any completions in the Broads will count towards the wider Borough need/targets. • Page 11, para 6 says ‘The Borough is varied, but includes some of the most deprived areas in the country’ – not sure of the relevance of this statement to this section. • 2.1.1.7 and page 23 penultimate paragraph – do you intend to address affordable housing policy review? I note that the NPPF relating to affordable housing now does not refer to AONB (new NPPF paragraph 63). Are the current thresholds still valid as a result? • Page 14 – I think there should be a map there, but the page is blank. • G2-dp and policies maps. It is not clear how the symbol of strategic gaps is used. Is the extent of the symbol the extent of the gap, so one can develop up to that? If so, up to which part of the symbol? Policy justification does not reference relevant local landscape character assessment(s) Policy G2-dp.

	<p>Strategic gaps policy is welcomed however gaps are ill-defined. The policy wording and map does not offer a clear definition of each strategic gap; is the gap the entire open area which currently exists between settlements or just the area the symbol covers? In order to protect a strategic gap from development that reduces the physical size / appearance, the areas will need to be defined – this assessment is usually undertaken using local landscape character assessments as a baseline to identify important gaps, with input from a landscape professional to define areas. See South Norfolk landscape designations review for an example; https://www.south-norfolk.gov.uk/residents/planning/planning-policy/landscape-character-assessments . Could be some cross-border co-ordination required as GYBC landscape character assessment identifies the gap between Corton and Hopton, which hasn't been brought forward into the policy.</p> <ul style="list-style-type: none"> • H2-dp – first part refers to agriculture or other rural based occupancy conditions but later only refers to agriculture. Do a, b and c only relate to agriculture occupancy conditions? • General thought around policies H4-dp to H6-dp, has the Borough considered supporting 'lifetime housing' through policy; whereby new properties are designed with the forethought for future adaptations e.g. downstairs cloakroom W/C with enough floorspace to become wetroom. • H5-dp – for information, we refer to these as residential ancillary accommodation rather than residential annexes. • H11-dp – note this is positively worded, but what about development that negatively impacts on, for example, landscape? Support inclusion of dark skies, but would welcome reference in the reasoned justification to this and perhaps reference to our policy and background work. In second section of policy relating to larger housing developments, reference to landscape and visual effects of development required. Could link to strategic gaps policy in policy text and justification. I think (a. iv) may be referring to the local public rights of way network – if so, amending 'the local footpath network' to the 'local public rights of way network' or 'local highway network' would be stronger and allow scope for connections to cycle-able routes such as bridleways and cycle paths. • H13-dp – 'apply flexibly the relevant policies of the development plan'. Development in GYBC has the potential, if near to the border with the Broads, to affect the Broads. The only caveat to applying policies flexibly is that relating to timing of delivery. How will impact on the Broads be upheld in such circumstances? • B1-dp, ii – 'it can be demonstrated that they could not be accommodated within defined settlements; or' when you say defined settlement do you mean development limits? That is referred to in the supporting text. • L4-dp, L5-dp – request these refer to the setting of the Broads. Might be a relevant reference in other policies that could result in or assess development near to the boundary with the Broads. • Does E2-dp repeat some of E2-dp? Or does it provide the detail? • I note the use of the term 'unacceptably adverse impacts' in E1-dp. Elsewhere the phrase 'significant adverse impact' is used. Is there scope for consistency in the terminology used? • E2-dp – slightly confused by this policy. Entitles relocation but refers to replacement in the policy. The first part (1) seems to be about things that can go in place of the thing being relocated, but section 3 refers to that as well. Section 2 refers to commensurate with what is replaced, but is that in relation to the original site as per number 3? In the supporting text, what does 'well
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related’ mean – I also do not see reference to this in the policy.

- Page 62, second paragraph – perhaps mention the Act to which the references relate to.
- Policy E4-dp (a iii.) Amend ‘links to the wider public footpath network’ to ‘links to the wider public rights of way network’.
- E6-dp – support the policy especially reference to the Broads. Could refer to the setting of the Broads as well? (3.b.) amend ‘a landscaping plan’ to ‘a hard and soft landscape plan’
- Page 64, second paragraph – also mention the Broads Authority Landscape Sensitivity Study and Landscape Character Assessment.
- C1-dp – we have a similar policy. Our policy also refers to consulting with the community about proposals relating to existing community facilities.
- I2-dp – support this policy as it aligns with our similar policy.
- GY7-dp, page 89 – refers to etc. like other policies (as mentioned previously).
- Page 97, penultimate paragraph – note the Yacht Station not far from the train station – that provides overnight stopping facilities for boaters.
- Affordable housing zones – as the Authority has regard to your policies on affordable housing, it would be helpful if the hatching that showed which affordable housing zones a particular area is within was shown in the Broads area as well.
- The Broads is identified as an area of potential for exceptional waterlogged heritage by Historic England, although this ‘designation’ seems to apply to an area wider than the Broads Authority Executive Area. It may be something to consider in any heritage policy.

Wording/grammar/typographical errors spotted

- Page 3 – first paragraph – check use of brackets. Seems to be one missing.
- Page 3 – ‘This informs and constrains the way the plan is prepared, the content of the policies, and the type of evidence **need** to justify them’.
- Page 3 – ‘The preparation of this Draft Plan was undertaken by officers of the Strategic Planning team, in consultation with other Council services, and was **overseen Councillors** through the Local Plan Working Party and Policy and Resources Committee’.
- 2.1.1.1 – ‘Updating the Housing Target provides the opportunity both to quickly align the Borough with the Government’s latest Policy and Guidance on the matter, and to significantly reduce the local housing target to a level that is more realistic and **achievable level** in the local circumstances, where the current local housing development market does not support the scale of growth previously targeted by the Core Strategy’
- Page 9, second para – ‘This value is expected to fall because the latest Population Projections, on which the Household Projections are based, are showing a 35% reduction in population growth in the Borough since the previous issue, and ONS has indicated **is** intends to approach the calculations in the same manner as the previous, 2016, Households Projections’.
- Page 9, fourth para – ‘The reduced housing targets currently resulting from the new methodology are considered to **be** better reflect circumstances in Great Yarmouth’.
- 2.1.2.1 – ‘A Great Yarmouth Town Centre Boundary was designated by the Core Strategy **and shown is shown on** the adopted Policies Map’

- 2.1.2.1 – ‘Regent Road has been removed from the Town Centre Boundary and redefined through its own standalone policy (GY9-dp) which serves to strengthen its role as a link between the Town Centre and Seafront area’.
- 3.1.1.1 – ‘Development limits are one of the key policy tools available to guide location, type and amount of development to ensure it is delivers, and is consistent with, the adopted Core Strategy’
- 3.1.6.1 – ‘The following policy indicates how such assessments will be approach.’
- H10-dp - ‘B. Planning history - if there is evidence of previous applications for development of a larger sites of which the application site forms a part within the past 3 years of the date an application is made ad development of the larger site would still be acceptable under other policies of the Local Plan; or’
- H10-dp – ‘i. under construction or completed in the 3 years prior to the before the application is made; or’
- H10-dp – ‘ii. has been granted planning permission or approval of details within the last 3 years and remains capable on implementation and which is capable of being implemented’.
- H11-dp – ‘e. biodiversity (including trees ad hedgerow) protection and enhancement; and’
- H12-dp – ‘i. An agreement with the relevant Parish or Town Council for it to adopt the space and commit to (for which it may require an appropriate financial contribution from the developer);’ Is this finished? What needs to be committed to?
- L1-dp, Roman Numeral numbering starts from ii. Under ii there is an etc – not sure if that is meant to be there.
- Page 57 – ‘aim is to hold existing the defence line’
- Page 58 – ‘(i.e. those within susceptible to change within the next 25 years)’
- Page 59 – ‘The policy also requires the applicant to undertake seeks to address the’
- E4-dp – ‘development in Borough’. ‘to Natura 2000 designates sites’. ‘be require to make’
- Page 61 – ‘the above policy supports on the’
- Page 72 – ‘while Policy CS10 seeks promote the enjoyment’
- Page 80 - but this not required to meet the identified need.
- Page 82 – ‘To the west lies is Breydon Water (in the Broads 'national park', and outside of the Great Yarmouth Plan Area) and its surroundings).’
- Page 94 – ‘development proposals that will improvement of the overall quality’