
Breckland Plan Partial Review

Representations on behalf of Talavera Properties

Issue 2 Comments

March 2023

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1.0 INTRODUCTION

- 1.1 These representations have been prepared by Barton Willmore, now Stantec on behalf of Talavera Properties pursuant to Issues 2 of the Breckland Local Plan Partial Review Examination, following the publication of the Inspector's Matters, Issues and Questions for Examination date 10 March 2023.
- 1.2 This follows representations to the Regulation 19 consultations in relation to Talavera Properties' land interest on land North of Brandon, which has been subject to historic application and a recent Call for Sites submission. A plan of the land is provided for information in Appendix 1.
- 1.3 Comments are made to the Inspector in relation to Issue 2 only. Barton Willmore, now Stantec expect to attend the Hearing session of 18 April 2023 and wish to be informed of any additional processes ahead of that session.

2.0 ISSUE 2

'What is the justification for pursuing the BLPPR by means of an alternative timetable rather than a review of the four key policy areas set out in INF03 as required by the Inspector?'

2.1 Issue 2 relates to the question above, and is broken down into a number of queries. The reasons below do not seek to answer each question, and clearly labels the relevant question and response.

Q11. How is the alternative wording to Policy INF03, justified, effective and consistent with national policy and guidance?

2.2 The Breckland Local Plan Partial Review Submission Draft Topic Paper August 2022 clearly sets out why policy INF03 was added by the Inspector when assessing the original Local Plan. It confirms, that amongst other matters, it was due to the standard methodology of 612dpa being below the standard methodology calculation using subsequent household projection results.

2.3 Paragraph 33 of the National Planning Policy Framework 2021 (NPPF) states that policies in local plans and spatial development strategies should be reviewed to assess whether they need updating at least once every five years. The Local Plan was adopted in November 2019. The removal of the need for a Partial Review and the commitment to undertake a full review to be submitted by December 2024 would extend this timeline beyond the five year maximum as set out in the NPPF. As such, the changes and timeline as proposed contradict national policy and cannot be justified.

2.4 As set out within the Regulation 19 representations, the timeline is achievable, and as such, Breckland District Council should bring the submission date of the Plan forwards. We had suggested a submission target of June 2024, but note a two month delay to the Regulation 18 Issues and Options consultation. However, a minimum date of November 2023 should be targeted in order to meet the requirements of the NPPF.

2.5 The danger of the proposed changes is whether Breckland District Council adhere to the timeline and ensure the Local Plan submission meets the deadlines. Failure to do so would be in further breach of the NPPF, and would result in the Council having an out of date plan for a prolonged period.

Q14. In the light of responses to the above timetabling issues are the dates indicated for the completion of a full review of the Breckland Local Plan (BLP) achievable?

- 2.6 There are concerns that the timeline set out within the Local Development Scheme is indeed tight to guarantee a submission by December 2024. Policy INF03 should be reworded to install the timelines of the outstanding Regulation 18 and 19 stages, ensuring the Council are held accountable to these deadlines. An example of the potential strengthening and rewording of the policy may be:

Policy INF03 sets out the Council's commitment to undertake an immediate full Review of the Plan and to submit by November 2024 for examination. The Council also commits to the following timetable:

- *Regulation 19 (Issues and Options) complete by May 2023*
- *Regulation 18 (Preferred Options) complete by January 2024*
Regulation 19 (Publication Draft) complete by August 2024

Q17. Is the BLPPR effective? – What would be the consequences if the Council do not adhere to the submission of the full Local Plan Review by December 2024?

- 2.7 If the Local Plan is not submitted by December 2024 (or earlier as recommended), the process would not meet the requirements of the NPPF regarding the five year time periods. This is especially relevant given the Council are effectively removing the need to undertake any Partial Review, as required by the Inspector to make the original Local Plan sound. Policies would be come out of date, meaning uncertainty for residents in particular.
- 2.8 Given the lower housing requirements of the Local Plan when compared to current standard methodology (see Q.25 below), the Council would then need to find additional land to meet any shortfall in housing supply, given the standard methodology would be the basis for calculating housing need. It is noted the Plan period for the full review is set as 2021-2046.

Q18. What is the justification for seeking to delete the text which refers to policies becoming out of date (should the December 2024 date not be met)?

- 2.9 There is no justification for the removal of the text. It should therefore be reinstated accordingly.

Q21. The purpose of the requirement for a partial review as contained in INF03 was, amongst other things, to address the issue of meeting housing need. As the partial review delays rather than addresses that requirement on what basis can it be considered to be an effective strategy based on the evidence?

- 2.10 The strategy effectively delays the need to provide a higher annual number of dwellings. As such, the Council will likely need to plan for a larger housing within their Full Local Plan Review. This will put more pressure on that document in terms of meeting increased housing demand. Implementation of a Partial Review of housing need would have allowed the shortfalls to be addressed earlier. The original Local Plan required the Partial Review for a reason, and it not coming forward is not effective plan making.

Q24. Is the Statement of 5 year housing land supply statement of August 2022 submitted with the Plan review robust? What is the rationale for retaining 612 dwellings per annum for the remainder of plan period to 2036?

- 2.11 The release of subsequent affordability ratios show that the housing need figure has risen since the adoption of the previous Local Plan. By failing to undertake a Review, the Council are not currently planning for this additional demand. Any Partial or Full Review should Plan for the most recent up to date figures in order to meet identified demand. By not undertaking the Partial Plan Review, the Council will delay the planning of land to meet increased need.

Q25. What would the per annum figure be using the standard method for calculation? If different to the 612 figure why was that alternative not used for the most recent assessment?

- 2.12 Using the 2022 affordability ratios released in March 2023, the standard methodology for Breckland District Council is 661 dwellings per annum. This is an increase of 49dpa over the adopted Local Plan position. It is for the Council to answer the second part of the question.

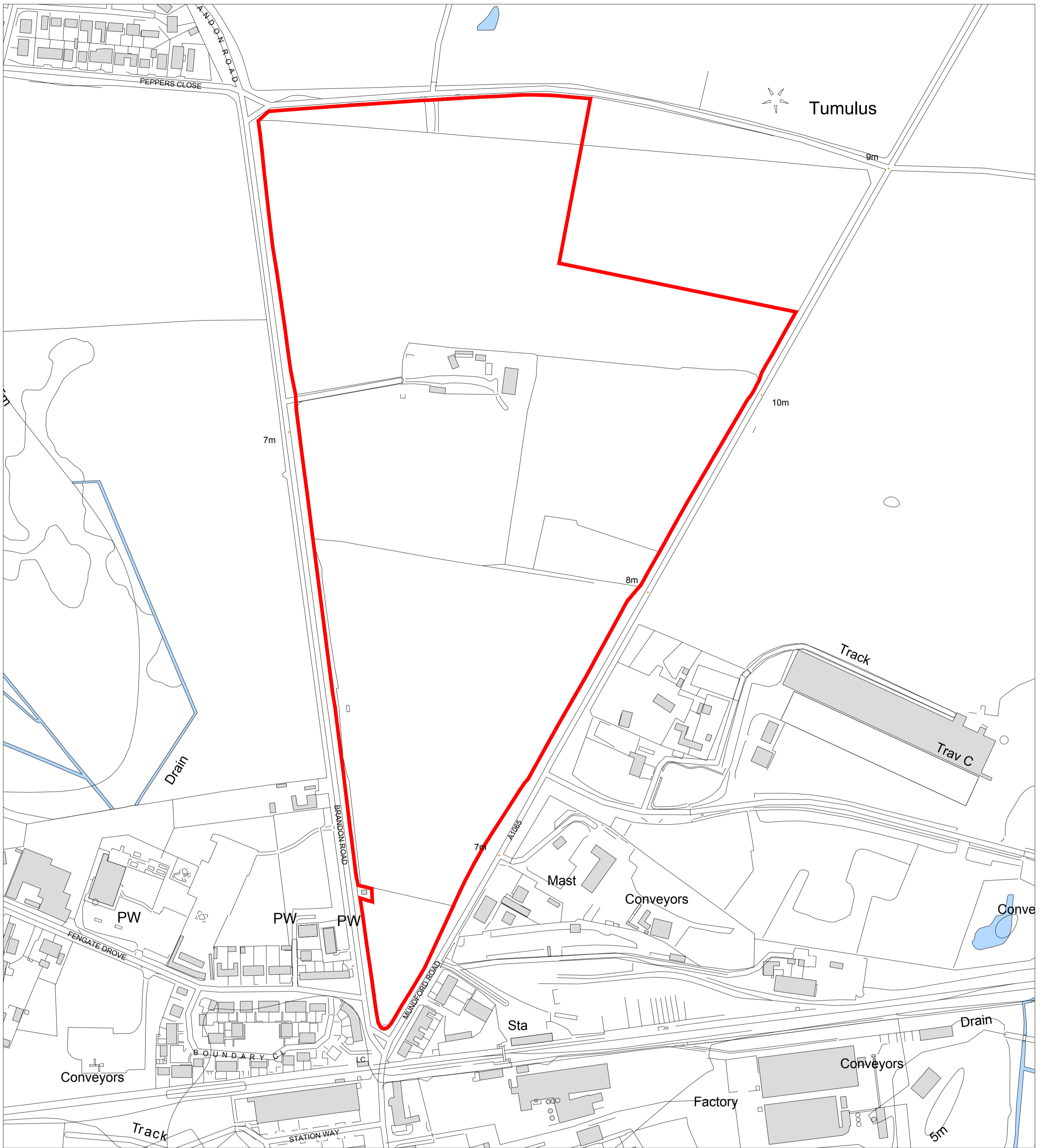
Q27. What would the consequences be for the removal of a review of the four policies until the full review due by December 2024?

- 2.13 As noted, the removal of a Partial Review and submission of a Full Review after November 2024 would mean relevant policies within the adopted Local Plan to become out of date. Furthermore, the Council are not meeting identified housing need, which will be delayed in coming forwards. The calculation of the five year housing land supply would utilise the

higher figure of 661dpa, thus reducing the five year housing land supply figure accordingly.

APPENDIX 1

Site Location Plan



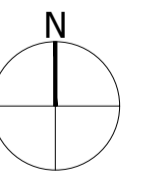
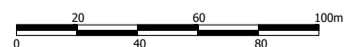
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Project
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Drawing Title
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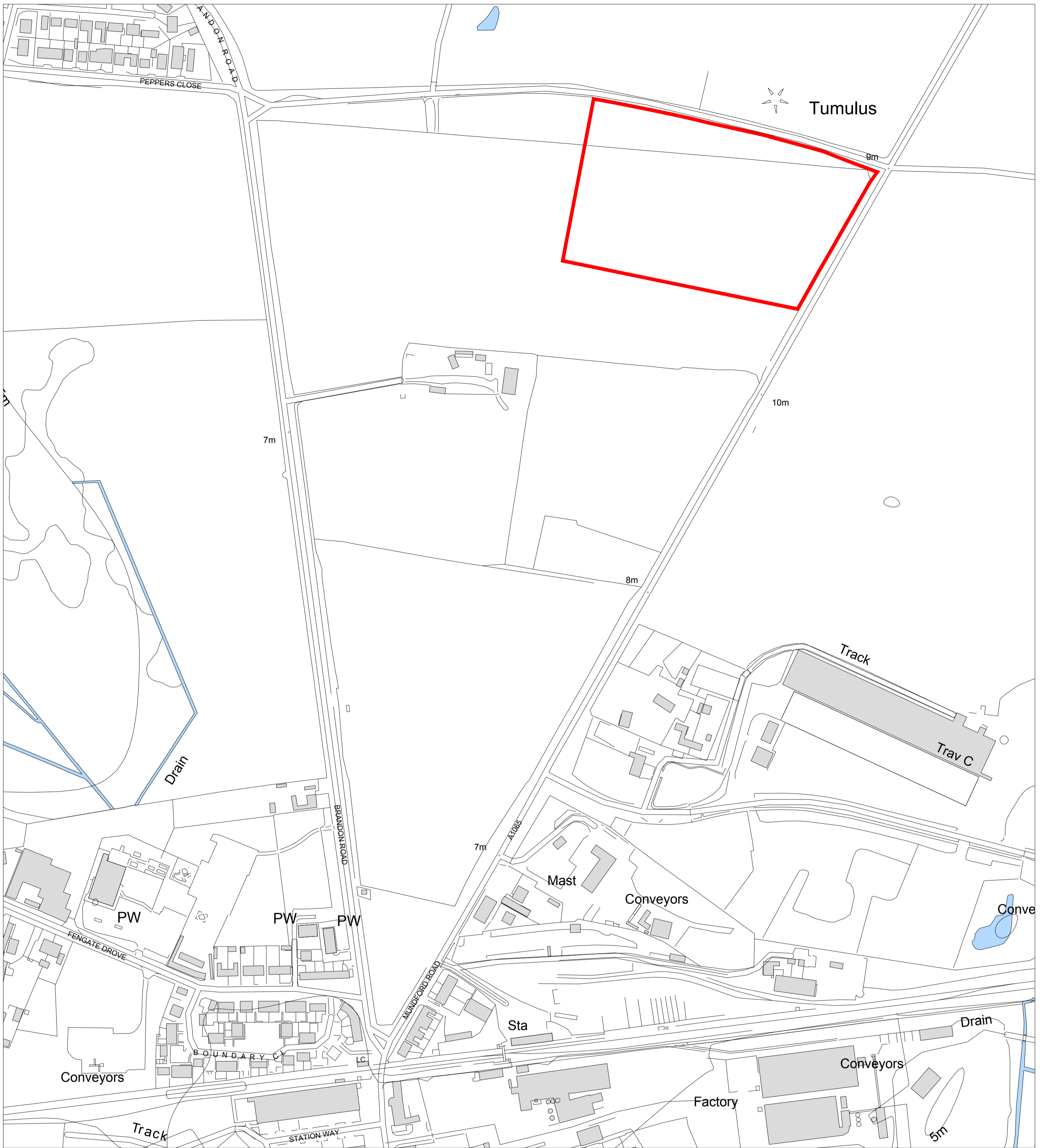
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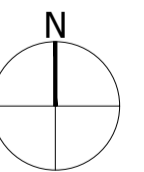




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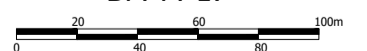
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