



Local Development Framework
Statement of Community Involvement

REGULATION 31
RESPONSES STATEMENT

August 2005

Peter Warner
Head of Planning & Development
Planning & Development Department
Maltings House
Malthouse Lane
Gorleston
Great Yarmouth
NR31 OGY

GREAT YARMOUTH BOROUGH COUNCIL



Statement of Representations made during the Formal Submission Stage of the Statement of Community Involvement (SCI)

In accordance with The Planning and Compulsory Purchase Act and Regulation 31 of the Town and Country Planning (Local Development) (England) Regulations 2004.

Introduction

The Statement of Community Involvement (SCI) outlines how Great Yarmouth Borough Council intends to involve the local community and key organisations in the preparation of the Local Development Framework for the Borough. It also outlines the arrangements for consultation on applications for planning permission.

This statement has been prepared in accordance with Regulation 31 of the Town and Country Planning (Local Development) (England) Regulations 2004. It sets out;

- The number of representations made in response to the Borough Council's Submission version of the SCI.
- A summary of the main issues raised in response to the SCI
- Copies of the representations submitted

Representations on the SCI were invited over a 6 week period from the 29 June 2005 until the 12 August 2005. Copies of the draft the Statement of Community Involvement were distributed to the specific bodies set out in Annex E of Planning Policy Statement 12 along with a copy of the public notice letter and a reply form with details of how to submit their representations, including methods to submit via an electronic reply form on the Council's website. The entirety of the LDF consultation database were also sent a letter detailing the statutory six (6) week period of SCI consultation and detailing where the document was available and how they could make representations (consultees included neighbouring Parish Councils). A copy of the SCI was made available on the Council's website (www.great-yarmouth.gov.uk). Copies were also made available at Great Yarmouth Borough Council Offices, Community Liaison Information Points (CLIP) and all local libraries in the Borough.

Great Yarmouth Borough Council invited all respondents set-out above to identify where they thought the document was not sound which is based on 9 tests of soundness, outlined in Planning Policy Statement 12 – Local Development Frameworks, paragraph 3.10.

NUMBER OF REPRESENTATIONS RECEIVED

A total of 15 representations were received on the SCI from organisations and individuals. 8 responded by letter and 7 responded by e-mail. 4 representations (of which 3 used the representations form) were seeking minor amendments to the text of the SCI. From the 4 representations, 1 withdrew their objection following discussion with Great Yarmouth Borough Council, 2 were content for their representations being dealt by written representations and 1 did not indicate a preference. From the remaining 11, 1 representation form was submitted in support of the SCI. The remaining 10 representations made general comments relating to the LDF database, changes of addresses, acknowledging receipt, requesting to be kept informed throughout

the LDF preparation process and providing links to statutory legislation, which did not seek changes to the content of the revised draft SCI.

SUMMARY OF REPRESENTATIONS RECEIVED

- Representations Received: **15**
- Objecting to part or text of the SCI: **4 (1 withdrew their objections)**
- Those representations wanting to appear at a Public Examination: **0**
- Remaining representations: **10 (General comment - do not effect the content of the revised draft SCI)**
- Those tests of soundness being considered failed: **4, 5 & 7 as indicated by the Government Office for the East of England and Home Builders Federation.**

A summary of the representations is attached at Appendix A, including Great Yarmouth's proposed action to be taken. Full copies of the representations are included at Appendix B. The 3 representations received seeking changes to the text of the SCI is set-out below in greater detail, including proposed action to be taken by Great Yarmouth Borough Council.

SUMMARY OF THE MAIN ISSUES RAISED

Under the 9 tests of soundness, no tests of soundness have been highlighted as not being met. From the 3 representations received seeking changes to the text of the SCI, 2 submitted using the representations form and 1 via a written explanation of the suggested amendments.

4 REPRESENTATIONS SEEKING CHANGES TO THE TEXT OF THE SCI

Representation Number 1- Seeking Amendments

Name	Peter Nash
Position	Community Youth Liaison Officer (Norfolk County Council)
Date Representation was Received	1 August 2005
Received via	E-mail
Test of Soundness failed	None
Summary of Comments	<p>The Youth Community Liaison Officer was pleased that they were included in the revised draft SCI under section 2.9 (Table 2 Hard to Reach Groups – Young People).</p> <p>The Youth Community Officer suggested the following text amendments to the hard to reach group – young people (table 5)</p> <p><i>Work with the Councils Community Strategy Officers to foster better links with young people through Norfolk Youth & Community Service in particular the Active Citizenship Worker who will work closely with the Great Yarmouth Local Strategic Partnership to involve young people in local decision making, particularly about issues or services that affect them.</i></p> <p><i>The “Hear by Right” standards for the active involvement of young people are being delivered by Norfolk Youth & Community Service, for example;</i></p> <ul style="list-style-type: none"> • <i>Focus groups seeking the views of young people.</i> • <i>Young people being involved in interviewing and appointing staff.</i> • <i>Consultation exercises for various organisations including NCC and the</i>

	<p><i>Borough Council.</i></p> <ul style="list-style-type: none"> • <i>Providing services based on young people's needs</i> <p><i>Norfolk Youth & Community Services organises and delivers the Great Yarmouth Youth Forum in partnership with the Great Yarmouth Borough Council. These relationships that the Youth Service has established along with partner agencies and young people will be an opportunity for the planning policy team to access.</i></p>
Proposed Action by Great Yarmouth Borough Council	The suggested amendments reflect the current relationship with the Community Youth Liaison Officer and Community Youth Forum in a clearer and more understandable way. Great Yarmouth Borough Council propose amending the SCI to reflect the suggested amendments to the text of the young people (hard to reach groups) in table 5 as being more reader friendly to the public and stakeholders.

Representation Number 2 – Seeking Amendments

Name	Andrew Hunter
Position/Organisation	Development Planning Officer – Environment Agency
Date Representation was Received	1 August 2005
Received via	Letter (correspondence has also been received via e-mail and telephone in response to the Environment Agency's letter. The Environment Agency withdrew their original suggestions)
Test of Soundness failed	None
Summary of Comments	<p>The Environment Agency originally objected to the omission of a section of text (paragraph 1.14) from the revised draft SCI stating that they felt Great Yarmouth Borough Council had failed point 4 of the tests of soundness in revised draft SCI on the grounds that the revised draft SCI did not set-out the participatory arrangements for the Sustainability Appraisal.</p> <p>Following further correspondence with the Environment Agency explaining that the participatory arrangements for the Sustainability Appraisal are set-out in table 5 (Development Plan Documents) of the revised draft SCI the following statement was e-mailed to Great Yarmouth Borough Council (refer to appendix 2 to view e-mail)</p> <p>"The Environment Agency wishes to conditionally withdraw its objection to this matter"</p>
Proposed Action by Great Yarmouth Borough Council	<p>The sustainability appraisal production process is highlighted in table 5 (Development Plan Documents) of the revised draft SCI. Great Yarmouth Borough Council contacted Andrew Hunter at the Environment Agency to explain where the sustainability appraisal production process is located in the revised draft SCI. For further clarification, Great Yarmouth Borough Council propose inserting text into paragraph 1.14 clearly describing the link to table 5 which highlights the sustainability appraisal production process.</p> <p>Further wording is proposed explaining that Sustainability Appraisals are to be prepared using the 'Sustainability Appraisal of Regional Spatial Strategies and Local Development Frameworks' guidance.</p> <p>To enable further clarity in the revised draft SCI, Great Yarmouth Borough Council propose including the following text to paragraph 1.14. The objective is to provide clear links with the sustainability appraisal participatory arrangements.</p> <p><i>"Sustainability Appraisal of Regional Spatial Strategies and Local Development Frameworks' guidance explains that the Sustainability Appraisal Guidance is to be revised, removing reference to the preparation of an initial Sustainability Appraisal Report. In keeping with the new system, Sustainability Appraisal is intended to be conducted throughout the preparation of Lids, rather than producing a "draft report". Therefore, the appraisal information will then be made available to the public and</i></p>

relevant bodies at the preferred options stage in the form of the final Sustainability Appraisal Report for the Lids. The participatory arrangements for Strategic Environmental Assessment & Sustainability Appraisal are set-out in table 5.”

Representation Number 3 – Seeking Amendments

Name	Helen NettleShip
Position/Organisation	Government Office for the East of England (GO-EAST)
Date Representation was Received	12 August 2005
Received via	Letter
Test of Soundness failed	4 & 5
Summary of Comments	<p>(representation 1) Table 1 page 12-13 includes the timetables for consultation/participation on the LDDs. GO-EAST considered that it was unnecessary to include specific dates in the SCI as this is the purpose of the LDS. Duplication of the timetable in the SCI may lead to inconsistencies and the need to formally review the SCI when/if dates change.</p> <p>1. GO-EAST suggest that any dates are removed and the LDS is cross-referred to in the SCI, so that readers know to refer to the LDS for the indicative dates of consultation periods.</p> <p>(Representation 2) PPS12, paragraph 3.10 soundness tests 4 and 5 require that the SCI to identify how the community and other bodies can be involved in a timely and accessible manner and that the consultation methods to be employed are suitable to the intended audience and for the different stages in the preparation of LDDs. As currently written, GO-EAST consider that the SCI is not sufficiently clear about which methods will be used and targeted at the different groups and bodies, for instance GO-EAST note that at para. 9 on page 43 it is written that we will select a combination of community involvement methods appropriate to the document being produced and its stage preparation and at para. 9 on page 44 we write that we will undertake more targeted consultation as required to raise awareness amongst hard to reach and under represented groups and organisations. With this level of uncertainty it is unclear what the methods are to be used and whether the methods are appropriate for the groups and bodies to be engaged at the different stages of LDD production.</p> <p>2. GO-EAST suggest, that while they appreciate that the SCI should not be overly prescriptive, we consider that the SCI should be more specific about the particular engagement methods and techniques that will be used to engage with different types of groups at the different stages of production for each generic type of DPD. This could be achieved by setting out the criteria which will be used to determine the appropriateness of methods set out in table 4,</p>
Proposed Action by Great Yarmouth Borough Council	<p>1. Great Yarmouth Borough Council propose removing dates and the LDS is cross-referred to in the SCI, so that readers know to refer to the LDS for the indicative dates of consultation periods.</p> <p>2. Great Yarmouth propose, that while the Council appreciate that the SCI should not be overly prescriptive, we consider that the SCI should be more specific about the particular engagement methods and techniques that will be used to engage with different types of groups at the different stages of production for each generic type of DPD. Great Yarmouth Borough Council propose setting out the criteria which will be used to determine the appropriateness of methods set out in table 4,</p>

Representation Number 4 – Seeking Amendments

Name	Paul Cronk
Position/Organisation	House Builders Federation
Date Representation was Received	(Received 15 th August, but letter is dated 12 August)
Received via	Letter
Test of Soundness failed	4 & 7

<p>Summary of Comments</p>	<p>Specific Matters:</p> <p>1. Para.1.35 – A list of background documents to be prepared is identified including a ‘Housing Needs Study’ as well as a range of other key background documents that will be part of the evidence gathering process.</p> <p>In addition, HBF suggest that in order to comply with recent government guidance, the HBF believes that mention also needs to made to Housing Market Assessments. These should involve representatives of the development and property industries (as key stakeholders) in their preparation.</p> <p>HBF suggests that the Council will need to instigate this work (probably in association with some neighbouring local authorities and the Regional Assembly). The absence of such Assessment would significantly weaken the evidence base for Development Plan policies and be contrary to tests of soundness no.4 and also the test of soundness no.7</p> <p>2. Appendix 2: HBF note and welcome the specific reference to the House Builders Federation as a key consultee. How ever, as the federation has recently altered its name to the ‘Home Builders Federation’ HBF would appreciate it if the entry is amended to HBF for the purposes of accuracy</p>
<p>Proposed Action by Great Yarmouth Borough Council</p>	<p>1. Great Yarmouth Borough Council suggest amending the SCI (para. 1.35) to reflect that a housing needs assessment would be carried as part the Housing Needs Study.</p> <p>2. Great Yarmouth Borough Council suggest updating the House Builders Federation to the Home Builders Federation.</p>

From the remaining 11 representations, Renewables East and West Norfolk Primary Care Trust provided changes of address information, Atisreal and Strutt & Parker asked to be kept informed in the preparation of the LDF, The Countryside Agency and English Heritage provide specific guidance and related information related to the Local Development Framework and also asked to be kept informed throughout the LDF process. The Runham Vauxhall Residents Association and the Broads Authority were in support of the revised draft SCI. Norfolk County Council Planning and Transportation Department had no strategic planning policy concerns with the draft SCI, however queried if they were a statutory consultee on planning applications. The Highways Agency had no comments to make on the revised draft SCI as did Barton Wilmore Planning.

A copy of the Submission Document SCI and Local development Scheme are enclosed. The Council considers there are no additional documents relevant to the preparation of the document.

APPENDIX A: SUMMARY OF RESPONSES TO SUBMISSION DOCUMENT

Respondent	Summary of Representations	Officer Comment	Proposed changes to the revised draft SCI
<p>1. Peter Nash (Community Youth Liaison Officer) Norfolk County Council</p>	<p>The Youth Community Liaison Officer was pleased that they were included in the revised draft SCI under section 2.9 (Table 2 Hard to Reach Groups – Young People).</p> <p>The Youth Community Officer suggested the following text amendments to the hard to reach group – young people (table 5)</p> <p><i>Work with the Councils Community Strategy Officers to foster better links with young people through Norfolk Youth & Community Service in particular the Active Citizenship Worker who will work closely with the Great Yarmouth Local Strategic Partnership to involve young people in local decision making, particularly about issues or services that affect them.</i></p> <p><i>The “Hear by Right” standards for the active involvement of young people are being delivered by Norfolk Youth & Community Service, for example;</i></p> <ul style="list-style-type: none"> • <i>Focus groups seeking the views of young people.</i> • <i>Young people being involved in interviewing and appointing staff.</i> • <i>Consultation exercises for various organisations including NCC and the Borough Council.</i> • <i>Providing services based on young people’s needs</i> <p><i>Norfolk Youth & Community Services organises and delivers the Great Yarmouth Youth Forum in partnership with the Great Yarmouth Borough Council. These relationships that the Youth Service has established along with partner agencies and young people will be an opportunity for the planning policy team to access.</i></p>	<p>Great Yarmouth Borough Council is working with the Community Youth Liaison Officer and the Great Yarmouth Community Forum to undertake youth forum workshops to gather issues and options in preparation of the LDF. These workshops will take place in September, 2005 to coincide with preparing the issues and options of the Core Strategy.</p>	<p>Great Yarmouth Borough Council propose amending the SCI to reflect the suggested amendments to the text in the young people column (hard to reach groups) in table 5 as being more reader friendly to the public and stakeholders.</p>

Respondent	Summary of Representations	Officer Comment	Proposed changes to the revised draft SCI
<p>2. Stephen Faulkner (Planning Obligations Team Leader) Norfolk County Council</p>	<p>Norfolk County Council did not have any strategic planning policy concerns with the revised draft SCI.</p> <p>Confirmation was requested on whether Norfolk County Council are to be consulted on major planning applications.</p>	<p>The following was confirmed with Norfolk County Council. Norfolk County Council is a statutory consultee. Who the Council consult on major planning applications will depend greatly on the nature of the proposal and its location. Our standards for Major Planning Applications are set-out in table 7 (page 510 of the document. Norfolk County Council will be consulted on major planning applications at every occasion. Consultation on smaller applications will depend on the nature and location of the application.</p>	<p>No changes to the revised draft SCI</p>
<p>3. Maria Conti (Broads strategy Officer) Broads Authority</p>	<p>It was noted that representations received at Regulation 25 & 26 had been taken on board and this was appreciated. Representations stated that the revised SCI appears to be a very thorough document and the Broads Authority have no further comments to submit at this stage in the LDF preparation.</p>	<p>Great Yarmouth Borough Council is to be working very closely with the Broads Authority in preparation of their LDF. We currently attend the Broads Authority LDF Steering Group to share information.</p>	<p>No changes to the revised draft SCI</p>
<p>4. Andrew Hunter (Development Planning Officer) Environment Agency</p>	<p>The Environment Agency originally objected to the omission of a section of text (paragraph 1.14) from the revised draft SCI stating that they felt Great Yarmouth Borough Council had failed point 4 of the tests of soundness in revised draft SCI on the grounds that the revised draft SCI did not set-out the participatory arrangements for the Sustainability Appraisal.</p> <p>Following further correspondence by telephone and e-mail (see Appendix 2) the Environment Agency made the following comments having explained that table 5 in the revised draft SCI clearly sets-out the participatory arrangements for the production of the Sustainability</p>	<p>Although the participatory arrangements for the sustainability appraisal were covered in table 5 of the revised draft SCI, Great Yarmouth Borough Council feel that further clarity is required in paragraph 1.14 to provide links to table 5 and breakdown the requirements of the sustainability appraisal guidance</p>	<p>To enable further clarity in the revised draft SCI, Great Yarmouth Borough Council propose including the following text to paragraph 1.14. The objective is to provide clear links with the sustainability appraisal participatory arrangements.</p> <p><i>“Sustainability Appraisal of Regional Spatial Strategies and Local Development Frameworks’ guidance explains that the Sustainability Appraisal Guidance is to be revised, removing reference to the preparation of an initial Sustainability</i></p>

Respondent	Summary of Representations	Officer Comment	Proposed changes to the revised draft SCI
<p>4. Andrew Hunter (Development Planning Officer) Environment Agency continued.....</p>	<p>Appraisal: <i>“The Environment Agency wishes to conditionally withdraw its objection to this matter”</i></p>		<p><i>Appraisal Report. In keeping with the new system, Sustainability Appraisal is intended to be conducted throughout the preparation of Lids, rather than producing a “draft report”. Therefore, the appraisal information will then be made available to the public and relevant bodies at the preferred options stage in the form of the final Sustainability Appraisal Report for the Lids. The participatory arrangements for Strategic Environmental Assessment & Sustainability Appraisal are set-out in table 5.”</i></p>
<p>5. Peter Lee (Planning Advisor) Renewables East – University of East Anglia)</p>	<p>Renewables East (University of East Anglia) asks to be placed on the Great Yarmouth LDF database for consultation purposes relating to the documents comprising the LDF.</p> <p>Renewables East also brought the authorities attention to the commitments contained in the Energy White Paper in relation to renewable energy and how they have been reflected in PPS22 and its companion document and the draft RSS (Policy E8)</p>	<p>Renewables East have been placed on the LDF database for consultation purposes relating to the LDF production.</p> <p>All international, national, regional and local documents will be reviewed as part of the sustainability appraisal scoping report. All implications of those documents will help form the production of the Great Yarmouth LDF.</p>	<p>No changes to the revised draft SCI</p>
<p>6. Nikki Wright (Personal Assistant to John Rees – Director of Public Health) West Norfolk Primary Care Trust</p>	<p>Change of address and contact name.</p> <p>The representation gave a new contact name and address for the Primary Care Trust ((West Norfolk)</p>	<p>The address has been amended in the Great Yarmouth LDF database</p>	<p>No changes to the revised draft SCI</p>

Respondent	Summary of Representations	Officer Comment	Proposed changes to the revised draft SCI
7. Graham King (Countryside Officer) The Countryside Agency	<p>The Countryside Agency gave clear guidelines as set-out in their planning policy statement 'Planning tomorrow's Countryside' (2000), which establishes criteria to help the Countryside Agency determine their priorities in dealing with various proposals and consultations, given the very limited staff resources they have.</p> <p>Only in exceptional cases are the Countryside Agency able to consider direct involvement, which is where the proposal would:</p> <ul style="list-style-type: none"> -set national precedent where national guidance is lacking, or -have major impact on an important Countryside Agency initiative, or -have a fundamental effect on the intrinsic character of a National Park, Area of Outstanding Natural Beauty (AONB) or Heritage Coast <p>The Countryside Agency felt the revised draft SCI did not fall within these criteria; therefore no comments were made on the document.</p>	Criteria Noted	No changes to the revised draft SCI
8. Nicola Bickerstaff – Strutt and Parker (International Property Consultants)	<p>Strutt and Parker had no specific comments to make on the revised draft SCI; however, they wished to be kept informed in the preparation of the LDF.</p>	<p>Included in the Great Yarmouth LDF database and will be consulted where appropriate throughout the preparation of the LDF.</p>	No changes to the revised draft SCI
9. Katy Walker (Planning and Development) Atisreal	<p>Change of address and contact name.</p> <p>The representation provided a new contact name and address for The Royal Mail Group. Atisreal are acting upon their behalf.</p>	<p>Included in the Great Yarmouth LDF database and will be consulted where appropriate throughout the preparation of the LDF.</p>	No changes to the revised draft SCI

Respondent	Summary of Representations	Officer Comment	Proposed changes to the revised draft SCI
10. English Heritage	<p>English Heritage provided relevant guidance to take into account in the preparation of the LDF.</p> <p>English Heritage wished to be kept informed throughout the preparation of the Great Yarmouth LDF.</p> <p>English Heritage suggested the inviting the Councils Conservation officer and a representative from Norfolk County Council's archaeological services team to a SEA/SA workshop if the Council intend to hold such an event.</p> <p>English Heritage would like to receive a copy of the Council's community plan if it is revised.</p> <p>English Heritage provided an up-to-date address and contact for the LDF database</p>	<p>The guidance will be taken into account in the preparation of the LDF</p> <p>English Heritage will be kept informed inline with the implications of the SCI and where appropriate.</p> <p>Workshops are not planned for the production of the SEA/SA due to resources. However, English Heritage will be consulted throughout its production to help form its content.</p> <p>Noted</p> <p>The LDF database has been amended to reflect the new contact details.</p>	No changes to the revised draft SCI
11. Mrs J. A. Roberts Runham Vauxhall Residents Association.	The Runham Vauxhall Residents Association acknowledged receipt of the revised draft SCI and made representations in support of the document.	No comments	No changes to the revised draft SCI
12. Colin Bambury (Planning Manager) Highway Agency)	The Highways Agency acknowledged receipt of the revised draft SCI and had no comments to make.	No comments	No changes to the revised draft SCI

Respondent	Summary of Representations	Officer Comment	Proposed changes to the revised draft SCI
<p>13. Helen Nettleship (Development Plans Team) Government Office for the East of England (GO-EAST)</p>	<p>(representation 1) Table 1 page 12-13 includes the timetables for consultation/participation on the LDDs. GO-EAST considered that it was unnecessary to include specific dates in the SCI as this is the purpose of the LDS. Duplication of the timetable in the SCI may lead to inconsistencies and the need to formally review the SCI when/if dates change.</p> <p>1. GO-EAST suggest that any dates are removed and the LDS is cross-referred to in the SCI, so that readers know to refer to the LDS for the indicative dates of consultation periods.</p> <p>(Representation 2) PPS12, paragraph 3.10 soundness tests 4 and 5 require that the SCI to identify how the community and other bodies can be involved in a timely and accessible manner and that the consultation methods to be employed are suitable or the intended audience and for the different stages in the preparation of LDDs. As currently written, GO-EAST consider that the SCI is not sufficiently clear about which methods will be used and targeted at the different groups and bodies, for instance GO-EAST note that at para. 9 on page 43 it is written that we will select a combination of community involvement methods appropriate to the document being produced and its stage preparation and at para. 9 on page 44 we write that we will undertake more targeted consultation as required to raise awareness amongst hard to reach and under represented groups and organisations. With this level of uncertainty it is unclear what the methods are to be used and whether the methods are appropriate for the groups and bodies to be engaged at the different stages of LDD production.</p> <p>2. GO-EAST suggest, that while they appreciate that the SCI should not be overly prescriptive, we consider that the SCI should be more specific about the particular engagement methods and techniques that will be used to engage with different types of groups at the different stages of production for each generic type of DPD. This could be achieved by setting out the criteria which will be used to determine the appropriateness of methods set out in table 4,</p>	<p>No comments</p>	<p>1. Great Yarmouth Borough Council propose removing dates and the LDS is cross-referred to in the SCI, so that readers know to refer to the LDS for the indicative dates of consultation periods.</p> <p>2. Great Yarmouth propose, that while the Council appreciate that the SCI should not be overly prescriptive, we consider that the SCI should be more specific about the particular engagement methods and techniques that will be used to engage with different types of groups at the different stages of production for each generic type of DPD. Great Yarmouth Borough Council propose setting out the criteria which will be used to determine the appropriateness of methods set out in table 4,</p>

Respondent	Summary of Representations	Officer Comment	Proposed changes to the revised draft SCI
13. Helen Nettleship (Development Plans Team) Government Office for the East of England (GO-EAST) continued.....	for different groups and different types of documents		
14. Natalie Levett (Planner) Barton Wilmore	<p>Barton Willmore has no objections to the contents of the revised draft SCI.</p> <p>Barton Willmore requested they are included on the LDF database and consulted at key stages in the LDF process.</p>	Barton Willmore are already included in the LDF database and will be consulted at the key stages in the LDF production process	No changes to the revised draft SCI.
15. Paul Cronk (HBF Regional Planner) House Builders Federation	<p>Specific Matters:</p> <p>1. Para.1.35 – A list of background documents to be prepared is identified including a ‘Housing Needs Study’ as well as a range of other key background documents that will be part of the evidence gathering process.</p> <p>In addition, HBF suggest that in order to comply with recent government guidance, the HBF believes that mention also needs to made to Housing Market Assessments. These should involve representatives of the development and property industries (as key stakeholders) in their preparation.</p> <p>HBF suggests that the Council will need to instigate this work (probably in association with some neighbouring local authorities and the Regional Assembly). The absence of such Assessment would significantly weaken the evidence base for Development Plan policies and be contrary to tests of soundness no.4 and also the test of soundness no.7</p> <p>2. Appendix 2: HBF note and welcome the specific reference to the House Builders Federation as a key consultee. However, as the federation has recently altered its name to the ‘Home Builders Federation’ HBF would appreciate it if the entry is amended to HBF for the purposes of accuracy</p>	<p>Housing Market Assessment would be carried out as part of the Housing Needs Study as part if its evidence base. One part of the SCI is to set out:</p> <p><i>“How the Authority intends to achieve a continuous community involvement in the preparation of local development documents, and in major development control decisions”</i></p> <p>This does not include non-statutory documents such as Housing Market Assessment.</p>	<p>1. Great Yarmouth Borough Council suggest amending the SCI (para. 1.35) to reflect that a housing needs assessment would be carried as part the Housing Needs Study.</p> <p>2. Great Yarmouth Borough Council suggest updating the House Builders Federation to the Home Builders Federation.</p>