

<b>Report to</b>	Sustainable development panel 27 February 2013	<b>Item</b>
<b>Report of</b>	Head of planning service	<b>5</b>
<b>Subject</b>	Compliance of existing adopted policies with the National Planning Policy Framework	

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## **Purpose**

To inform the sustainable development panel of results of an exercise to assess the degree of compliance of existing adopted development plan policies for Norwich and the extent to which they are in accordance with the requirements of the National Planning Policy Framework (NPPF).

## **Recommendation**

That SD Panel members note the extent of compliance with the NPPF and particularly those policies to which reduced weight will need to be applied following 27 March 2013.

## **Corporate and service priorities**

The report helps to meet the corporate priority “A prosperous city” and the service plan priority to deliver the Local Plan for Norwich.

## **Financial implications**

There are no direct financial implications to this report.

Ward/s: All wards

Cabinet member: Councillor Bremner – Environment and development

## **Contact officers**

Mike Burrell, planning policy team leader 01603 212525

Graham Nelson, head of planning services 01603 212530

## **Background documents**

None

## Report

1. The National Planning Policy Framework (NPPF) was published on 27 March 2012. It is designed make the planning system less complex and more accessible, to protect the environment and to promote sustainable growth and significantly changed certain aspects of the UK planning system.
2. The NPPF recognised that although it applied and could be a material consideration from the day of publication, it would take some time to fully implement. It stressed that policies in existing Local Plans should not simply be considered out of date just because they were adopted prior to publication of the NPPF.
3. It also recognised that plans may need to be revised to take account of the NPPF. Owing to stage reached in relation to the site allocations and development management policies documents the focus of city council has been on bringing forward these documents rather than seeking to amend currently adopted plan. Assuming submission of the site allocations and development policies in April 2013 weight will be able to be attached to these emerging policies (which have already been assessed for NPPF consistency) from this point forward.
4. The NPPF suggested that for a 12 month period following the date of publication that decisions takers could still give full weight to relevant adopted policies even where there was a limited degree of conflict with the NPPF. However, following this 12 month period the weight ascribed to such policies would need to vary according to the degree of consistency with the NPPF.
5. This paper therefore considers the consistency of existing policies with the NPPF. Specifically it considers the policies in the adopted JCS, the adopted Northern City Centre Area Action Plan, and the 'saved' policies of the City of Norwich Replacement Local Plan and Norfolk Structure Plan. This work is set out in the appendices to this paper.
6. The work shows that most of the current planning policies are considered to be NPPF compliant and therefore can continue to be applied following 27 March, although many of these (especially the existing Local Plan policies) will be superseded as the emerging sites and development management plans are adopted. There are no policies that have been identified as being non-NPPF compliant (and so should not be taken into account in reaching planning decisions following 27 March). However, there are several that are considered to be only partially NPPF compliant (where the degree of weight will need to be considered on a case by case basis depending on the nature of conflict with the NPPF). These are set out in the table overleaf:

Policies partially inconsistent with NPPF – Applicability to be considered on a case by case basis following 27 March 2013	
Policy	Reason
JCS7	Policy addresses health, crime, education and community infrastructure. Health, crime and community infrastructure all appear consistent with NPPF. However, approach to education refers to development in the primary and secondary sectors to serve growth areas and more general support for development of tertiary education. This appears to omit any reference to the very positive statement relating to widening the choice in education generally in page 72 of the NPPF.
HBE1	RLP policy does not permit development which would detrimentally affect a Scheduled Ancient Monument (SAM), whilst paragraph 132 of NPPF states that such development should only be permitted in wholly exceptional circumstances.
HBE2	RLP policy requires development which would affect priority archaeological areas and standing remains to improve their setting in line with paragraphs 135 and 137 of the NPPF. However, it does not have the NPPF paragraph 132 caveat that in exceptional circumstance such development may be permitted.
HBE3	RLP policy requires development which could affect archaeological remains to be subject to an assessment of their significance in line with paragraph 128 of the NPPF. It also requires preservation of the remains in situ where possible and a record of the remains to be made if not, which reflects the requirements of paragraphs 132, 133 and 141 of the NPPF. However, the policy does not have the NPPF paragraph 132 caveat that in exceptional circumstance development that does not meet these requirements may be permitted.
HBE4	As for HBE3 above.
HBE9	The policy is consistent with Conservation Area policy set out in paragraphs 133, 134, and elsewhere in section 12 of the NPPF except that paragraph 130 of the NPPF sets a stronger requirement in relation to listed buildings in a poor state of repair.
HBE20	The RLP policy requires telecommunications applications to share existing locations and facilities where possible and minimise visual impact in line with paragraph 33 of the NPPF. However, supporting evidence and coverage of safety issues required by paragraph 45 and 46 of the NPPF varies somewhat from the RLP policy, and the NPPF requirements will therefore need to be implemented.
EP2	This policy partially complies with NPPF paragraphs 109, 110, 120 and 121 which require plans to have policies to cover ground stability issues so that they will be addressed by a developer prior to development. It follows the recommendations of a 2003 study in identifying the streets most prone to subsidence in the past, but only lists these in broad terms. Policy EP2 therefore does not give certainty and might impose unreasonable upfront costs on developers if risk is implied where none actually exists on a specific site. Therefore, in order to comply with the NPPF, it will be important to apply the more flexible emerging policy approach in development management plan policy DM11. This recognises that subsidence risk may

	<p>exist in much of Norwich to a greater or lesser degree, but acknowledges that remedial measures are likely to be exercised through building control rather than planning. The emerging policy will ensure that appropriate and proportionate consideration is given to mitigating identified risk in relation to the “best available evidence” at the time, and that any resultant abnormal build costs are taken into account where there is likely to be an appreciable impact on viability.</p>
EP5	<p>This policy complies partially with NPPF paragraph 109, 110, and 120 which require plans to ensure that development is appropriate for its location taking account of the need to minimise risk of and prevent unacceptable harm from pollution. However the focus of policy EP5 on mitigating the impact of pollution-causing development does not fully take into account the impacts of locating other forms of development close to <i>existing</i> sources of air pollution. The requirement for “<b>development</b> (sic) ... <b>to assess the level of risk of demonstrable harm to human health or to the environment and to identify appropriate mitigation measures</b>” is poorly worded and does not offer certainty to developers as to detail required, how such an assessment would be used or how it would inform decision-taking. Such an approach may not comply with NPPF paragraph 122 which makes clear that local planning authorities should focus on whether the <b>development itself</b> is an acceptable use of the land, and the impact of the use, rather than the control of processes or emissions which are the subject of separate legislation (which local planning authorities should assume will operate effectively). In order to comply with the NPPF it will be necessary to apply the more balanced approach set out in emerging DM policies DM2 and DM11. These policies will have a clearer focus on the planning issues, acknowledging the interrelationship of neighbouring uses and recognising that impacts may need to be addressed from existing, as well as proposed, sources of air pollution (complying with NPPF para 109).</p>
EMP16	<p>The policy is only considered to be partially compliant with the NPPF insofar as aspects of the policy would appear to conflict with the application of the sequential approach to office development. With regard to major office development the policy suggests that first preference should be given to specified sites in the City Centre, then other sites within or adjacent to the City Centre and then certain specified “prime” employment areas. As there is little potential for accommodating this scale of office development within existing District Centres and the “prime” employment areas are generally more accessible than other employment areas, this is considered broadly consistent with the sequential approach set out in the NPPF. However, with regard to smaller scale office development the sequential approach would suggest that sites within or adjacent to other centres should be considered before employment land is released for office development. This aspect of the policy is therefore considered to be inconsistent with the NPPF and should no longer be applied to considering the acceptability of smaller scale office development outside of the City Centre.</p>
EMP18	<p>The policy is only partially compliant with the NPPF. It complies with paragraph 21 which requires local authorities to plan</p>

	<p>positively for the location, promotion and expansion of clusters or networks of knowledge driven, creative or high technology industries. However it includes an exemption from the sequential test requirement where a proposal can show need to locate close to particular educational and research establishments. This would not allow full and proper consideration of reasonable alternative sites and not necessarily promote a sustainable or accessible pattern of development, contrary to NPPF paragraph 24 which requires preference to be given to accessible sites that are well connected to the town centre.</p>
EMP19	<p>This policy meets the requirements of paragraph 72 of the NPPF to proactively promote development which will widen choice in education and the core planning principle in paragraph 17 to support economic development (which includes education as a public and community use) by enabling educational development. However, the requirement for the provision of additional student accommodation in association with the growth of educational establishments may be considered to be onerous in view of the NPPF's emphasis on proactively driving and supporting sustainable economic development and focus on local planning authority requirements in relation to costs in paragraph 173. Therefore, members should consider on a case by case basis whether this element of the policy should be applied.</p>
EMP20	<p>This policy meets the requirements of paragraph 72 of the NPPF to proactively promote development which will widen choice in education and the core planning principle in paragraph 17 to support economic development (which includes education as a public and community use) by enabling further growth within the UEA campus. It meets the requirements of paragraph 132 that development affecting designated heritage assets such as the listed buildings at UEA should give great weight to the asset's conservation. However, the requirement for the provision of additional student accommodation in association with the growth of the university may be considered to be onerous in view of the NPPF's emphasis on proactively driving and supporting sustainable economic development and focus on local planning authority requirements in relation to costs in paragraph 173. Therefore, members should consider on a case by case basis whether this element of the policy should be applied.</p>
HOU13	<p>This site specific policy generally meets the requirements of paragraph 49 of the NPPF by enabling windfall development in locations in compliance with the presumption in favour of sustainable development in paragraph 14 of the NPPF. This states that "Local planning authorities should positively seek opportunities to meet the development needs of their area." However, when assessing such windfall sites, members should note that this policy was drafted under previous government guidance. Residential gardens are no longer classified as brownfield land. Particular care should be taken in such cases to assess the likely impact of housing development on the character and amenity of the surrounding area as set out in clause 5 of policy HOU13 to be compliant with the thrust of national policy in paragraph 53 of the NPPF on resisting development in gardens where it would cause harm to local areas.</p>

SHO12	<p>This policy complies partially with section 2 of the NPPF, which requires policies to ensure the vitality of centres. In particular it complies with paragraph 23 which requires local planning authorities to define a network and hierarchy of centres that is resilient to anticipated future economic changes and with paragraph 69 which promotes the creation of active street frontages. It does not however make any distinction in terms of acceptability between “in-centre” and “edge of centre” locations, whereas it is clear from paragraph 24 of the NPPF that the former should be given preference over the latter. Consequently the NPPF’s sequential test principles in paragraph 24 should apply in respect of any proposals where this choice needs to be made.</p>
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7. It is planned to run a training session for members on the planning applications committee on the implications of this work for development management prior to 27 March.

## **Appendix - Update on the National Planning Policy Framework and planning policies for Norwich**

The publication of the National Planning Policy Framework (NPPF) has significant implications for the relevant parts of the development plan for Norwich: the Joint Core Strategy (adopted 2011); the remaining “Saved” policies of the City of Norwich Replacement Local Plan (RLP) (adopted 2004); the Northern City Centre Area Action Plan (adopted 20010); and the four saved policy of the Norfolk Structure Plan (adopted 1999). Annex 1 of the NPPF states that subsequent to March 2013, relevant policies from existing plans should be given due weight according to their degree of consistency with the Framework (paragraph 215, p48).

The purpose of this document is to provide guidance to decision makers on planning applications by advising on the weight they should give to the existing policies in the above plans. The following tables provide an assessment of the consistency of all the existing policies with the NPPF with an explanation as to why each policy is consistent, partly consistent or not consistent with the NPPF. Where policies are partially consistent, account should be taken of the usually minor differences with the NPPF in decision making. Where policies are inconsistent with the NPPF, the policy is effectively no longer saved and the NPPF policy approach, as highlighted in the table, should be taken. In some cases, where policies are now outdated, for example due to the completion of relevant developments for site specific policies, the opportunity has been taken to establish that these are effectively redundant.

In the case of saved RLP policies and the remaining Norfolk Structure Plan policy, this is an interim measure. These policies will be superseded when emerging Local Plan policies in the Site Allocations and Development Management plans, which will be NPPF compliant, are adopted. This is scheduled for late 2013/early 2014.

Note: The Site Allocations and Development Management plans will be submitted in April 2013. Once this has happened, decision-takers may also give weight to these policies dependent upon the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given) and the degree of consistency of the relevant policies in the emerging plan to the NPPF. It is the view of officers that all emerging policies are consistent with the NPPF and evidence to this effect will be submitted alongside the draft plans.

## **Joint Core Strategy**

The Joint Core Strategy for Broadland, Norwich and South Norfolk was adopted in March 2011. By virtue of a court order issued in 2012 certain elements of the JCS were remitted for further and are not to be treated as adopted. This work is ongoing and the remitted parts of the JCS were submitted to the Secretary of State in February 2013 and are due to be examined later in the spring.

In accordance with best practice this submission document was accompanied by a self-assessment of the submitted parts of the JCS against the NPPF. That self assessment only addressed the parts of the JCS that do not remain adopted, however, it noted that the overall thrust of the JCS is considered entirely consistent with the NPPF.

This assessment builds on the previous work and considers whether the individual adopted policies of the JCS are compliant with the NPPF. It considers only the parts of the adopted JCS relevant to area of Norwich City.

<b>Policy</b>	<b>Subject Matter</b>	<b>Consistent with NPPF</b>	<b>NPPF coverage of issues</b>
JCS1	Addressing climate change and protecting environmental assets	Yes	Broad policy which covers many aspects of the NPPF including the core planning principles and secs 4 (sustainable transport), 7 (good design), 8 (healthy communities), 10 (climate change and flooding), 11 (conserving natural environment) and 12 (historic environment). Although it is noticeable that policy contains no clear presumption in favour of sustainable development (para 15 of NPPF) none of the text in the policy is considered to conflict with the principles set out in the NPPF.
JCS2	Promoting good design	Yes	Policy principles compatible with the content of sec 7 of the NPPF (requiring good design). Only potential area of conflict identified is the omission of any requirement in the policy (or elsewhere in the JCS) to optimise the potential of the site to accommodate development. However, this omission is addressed in the emerging development management policies DPD in Norwich and so no conflict has been identified.



Policy	Subject Matter	Consistent with NPPF	NPPF coverage of issues
JCS3	Energy and water	Yes	Policy appears to be consistent with the principles on both energy and water set out in sec 10 of the NPPF. Policy coverage related to water is perhaps more detailed than that envisaged in NPPF (which receives rather cursory attention in paras 94 and 109) but this is perhaps not surprising given the growth proposed in the JCS area, the low rainfall in the area and the proximity of important wetland areas. No conflict identified.
JCS4	Housing Delivery	Yes	Policy addressed quantity, mix and nature of provision in accordance with sec 6 of the NPPF. Policy also addresses provision for gypsies and travellers which is not addressed in the NPPF as is subject to further govt guidance.
JCS5	The economy	Yes	Thrust of the policy complies with sec 1 of the NPPF on building a strong, competitive economy including reference to innovative and flexible approaches in accordance with the final bullet of para 21. Final bullet of policy concerning provision of sufficient employment land restricts range of uses of such land to employment and related uses only. This is potentially conflicting with para 51 of the NPPF which states applications for change of use of B class commercial uses to residential should normally be approved where there is an identified need for housing provided there are not strong economic reasons why such development would be inappropriate. In this case it is considered that the JCS evidence base provides these economic reasons to protect employment land so no conflict with NPPF is identified.
JCS6	Access and transportation	Yes	Policy sets out main transport priorities which appear consistent with principles of sec 4 of NPPF. Noticeable that the policy contains no requirement for major developments to be accompanied by the transport assessments (as required by para 32 of NPPF) although this matter can properly be addressed in development management policies. Final sentence of the policy which requires all development to demonstrate how it contributes to the objective of promoting fast broadband appears to go beyond para 42 of the NPPF.

<b>Policy</b>	<b>Subject Matter</b>	<b>Consistent with NPPF</b>	<b>NPPF coverage of issues</b>
JCS7	Supporting communities	Partially	Policy addresses health, crime, education and community infrastructure. Health, crime and community infrastructure all appear consistent with NPPF. However, approach to education refers to development in the primary and secondary sectors to serve growth areas and more general support for development of tertiary education. This appears to omit any reference to the very positive statement relating to widening the choice in education generally in page 72 of the NPPF.
JCS8	Culture, leisure and entertainment	Yes	Difficult to assess consistency as no direct reference to culture in the NPPF (apart from recognition in appendix that cultural facilities can be main town centre uses). However, thrust of the policy does not appear to conflict with any aspects of NPPF.
JCS9	Strategy for growth	Yes	Policy seeks to describe strategic approach for housing, transport, green infrastructure and employment development in the Norwich Policy Area. Areas of policy coverage all consistent with NPPF and appropriate for a core strategy. Strategy itself is up to date, positive about growth and is based on a strong evidence base having been found sound at an independent examination in 2010. Therefore policy is considered to be consistent with the NPPF.
JCS10	Major new or expanded communities in the NPA	Not assessed	Policy addresses major growth areas all which are outside of the administrative area of Norwich City.
JCS11	Norwich City Centre	Yes	Positive policy about developing the role of the City Centre and accommodating development of various types. Would appear to be consistent with approach of NPPF as outlined in sec 2 (ensuring the vitality of town centres).
JCS12	Remainder of the Norwich Urban Area	Yes	Broad ranging policy that relates to many different parts of the NPPF. No conflict with NPPF identified although policy only refers to expansion of higher education facilities being promoted so is perhaps less positive than para 72 of NPPF (see JCS7 above).
JCS13	Main Towns	Not assessed	Policy addresses main towns all which are outside of the administrative area of Norwich City.

<b>Policy</b>	<b>Subject Matter</b>	<b>Consistent with NPPF</b>	<b>NPPF coverage of issues</b>
JCS14	Key Service Centres	Not assessed	Policy addresses key service centres all which are outside of the administrative area of Norwich City.
JCS15	Service Villages	Not assessed	Policy addresses service villages all which are outside of the administrative area of Norwich City.
JCS16	Other Villages	Not assessed	Policy addresses other villages all which are outside of the administrative area of Norwich City.
JCS17	Smaller rural communities and Countryside	Not assessed	Policy addresses areas which are outside of the administrative area of Norwich City.
JCS18	The Broads	Yes	Policy seeks to ensure adequate attention is paid to the importance of the Broads. This is consistent with the NPPF (especially sec 11).
JCS19	Hierarchy of Centres	Yes	Approach of the policy consistent with a number of parts of the NPPF, notably sec 2 on ensuring vitality of town centres. Again there is a potential conflict with the final part of the policy which seeks to protect function of centre by restricting the loss of commercial premises or local services with para 51 of the NPPF which is more positive to the change of use of commercial to residential. However, references to these controls only being applied where necessary to protect its function are considered to amount to “strong economic reasons” referred to in NPPF so no conflict has been identified.
JCS20	Implementation	Yes	No conflict with NPPF identified.

**The Replacement Local Plan (adopted 2004)**

<b>Policy</b>	<b>Subject Matter</b>	<b>Consistent with NPPF</b>	<b>NPPF coverage of issues</b>
NE1	Protection of environmental assets from inappropriate development	Yes	The RLP policy allows only very limited forms of development in Mousehold and the river valleys in line with the NPPF requirement to set criteria based policies for any development in landscape areas (paragraph 113) and to protect and enhance “valued landscapes” (paragraph 109).
NE2	Woodland protection	Yes	The policy complies with NPPF paragraph 117 which requires planning policies to minimise impacts on biodiversity and preserve ecological networks. It also covers the paragraph 188 requirement that planning permission should be refused for the loss of irreplaceable habitats including ancient woodlands (this is relevant to Lion Wood).
NE3	Tree protection control of cutting, lopping etc.	Yes	The policy complies with NPPF paragraph 117 that planning policies should minimise impacts on biodiversity and preserve ecological networks. It also complies with paragraph 188, which states that planning permission should be refused for the loss of irreplaceable habitats including veteran trees.
NE4	Street trees to be provided by developers	Yes	The policy complies with NPPF paragraph 117 requirement to minimise impacts on biodiversity and promote ecological networks
NE7	Protection of locally designated sites of nature conservation interest	Yes	The policy complies with NPPF requirement in paragraph 113 to provide criteria based policies to protect wildlife sites and the paragraph 117 requirement to minimise impacts on biodiversity and promote ecological networks.
NE8	Management of features of wildlife importance and biodiversity	Yes	The policy complies with the requirements of NPPF paragraph 118 concerning the conservation and enhancement of biodiversity.
NE9	Comprehensive landscaping scheme and tree planting	Yes	The policy complies with the requirements of NPPF paragraph 58 that new development should contain “appropriate landscaping.”

<b>Policy</b>	<b>Subject Matter</b>	<b>Consistent with NPPF</b>	<b>NPPF coverage of issues</b>
HBE1	Protection of Scheduled Ancient Monuments	Partially	RLP policy does not permit development which would detrimentally affect a Scheduled Ancient Monument (SAM), whilst paragraph 132 of NPPF states that such development should only be permitted in wholly exceptional circumstances.
HBE2	Protection of standing remains in Cathedral Precinct and other priority areas	Partially	RLP policy requires development which would affect priority archaeological areas and standing remains to improve their setting in line with paragraphs 135 and 137 of the NPPF. However, it does not have the NPPF paragraph 132 caveat that in exceptional circumstance such development may be permitted.
HBE3	Archaeological assessment in Area of Main Archaeological Interest	Partially	RLP policy requires development which could affect archaeological remains to be subject to an assessment of their significance in line with paragraph 128 of the NPPF. It also requires preservation of the remains in situ where possible and a record of the remains to be made if not, which reflects the requirements of paragraphs 132, 133 and 141 of the NPPF. However, the policy does not have the NPPF paragraph 132 caveat that in exceptional circumstance development that does not meet these requirements may be permitted.
HBE4	Other locations of archaeological interest	Partially	As for HBE3 above.
HBE6	Protection of mediaeval street network	Yes	Retaining the historic street pattern in the city centre complies with the NPPF requirement in paragraph 126 that new development, taking account of the historic environment, should make a positive contribution to local character and distinctiveness.
HBE7	Evaluation of standing archaeology	Yes	The policy requires development which would affect priority standing remains to improve their setting in line with paragraphs 135 and 137 of the NPPF.
HBE8	Development in Conservation Areas	Yes	The policy is consistent with Conservation Area policy set out in paragraphs 133, 134, 137 and 138 and elsewhere in section 12 of the NPPF.

<b>Policy</b>	<b>Subject Matter</b>	<b>Consistent with NPPF</b>	<b>NPPF coverage of issues</b>
HBE9	Listed Buildings and development affecting them	Partially	The policy is consistent with Conservation Area policy set out in paragraphs 133, 134, and elsewhere in section 12 of the NPPF except that paragraph 130 of the NPPF sets a stronger requirement in relation to listed buildings in a poor state of repair.
HBE12	High quality of design, with special attention to height, scale, massing and form of development.	Yes	The policy complies with design requirements in section 7 of the NPPF, most particularly in paragraph 58 to reflect local character and use local materials. It is also in line with NPPF policy in paragraph 126 that new development, taking account of the historic environment, should make a positive contribution to local character and distinctiveness.
HBE13	Protection of major views and height of buildings	Yes	As above for HBE12.
HBE14	Gateways to the City and quality design	Yes	As above for HBE12.
HBE20	Telecommunications Equipment	Partially	The RLP policy requires telecommunications applications to share existing locations and facilities where possible and minimise visual impact in line with paragraph 33 of the NPPF. However, supporting evidence and coverage of safety issues required by paragraph 45 and 46 of the NPPF varies somewhat from the RLP policy, and the NPPF requirements will therefore need to be implemented.
EP1	Contaminated land and former landfill sites – evaluation and treatment prior to permission	Yes	The policy complies with NPPF paragraphs 109, 110, 120 and 121 which require plans to have policies to cover contamination issues so that they will be addressed by a developer prior to development.

Policy	Subject Matter	Consistent with NPPF	NPPF coverage of issues
EP2	Testing for ground stability conditions	Partially	This policy partially complies with NPPF paragraphs 109, 110, 120 and 121 which require plans to have policies to cover ground stability issues so that they will be addressed by a developer prior to development. It follows the recommendations of a 2003 study in identifying the streets most prone to subsidence in the past, but only lists these in broad terms. Policy EP2 therefore does not give certainty and might impose unreasonable upfront costs on developers if risk is implied where none actually exists on a specific site. Therefore, in order to comply with the NPPF, it will be important to apply the more flexible emerging policy approach in development management plan policy DM11. This recognises that subsidence risk may exist in much of Norwich to a greater or lesser degree, but acknowledges that remedial measures are likely to be exercised through building control rather than planning. The emerging policy will ensure that appropriate and proportionate consideration is given to mitigating identified risk in relation to the “best available evidence” at the time, and that any resultant abnormal build costs are taken into account where there is likely to be an appreciable impact on viability.
EP3	Health and Safety consultations	Yes	This policy complies with NPPF paragraph 172 requiring planning policies to be based on up-to-date information on the location of major hazards and on the mitigation of the consequences of major accidents. Similar provisions are in emerging policy DM11.

Policy	Subject Matter	Consistent with NPPF	NPPF coverage of issues
EP5	Air Pollution emissions and sensitive uses	Partially	<p>This policy complies partially with NPPF paragraph 109, 110, and 120 which require plans to ensure that development is appropriate for its location taking account of the need to minimise risk of and prevent unacceptable harm from pollution. However the focus of policy EP5 on mitigating the impact of pollution-causing development does not fully take into account the impacts of locating other forms of development close to <i>existing</i> sources of air pollution. The requirement for “<b>development</b> (sic) ... <b>to assess the level of risk of demonstrable harm to human health or to the environment and to identify appropriate mitigation measures</b>” is poorly worded and does not offer certainty to developers as to detail required, how such an assessment would be used or how it would inform decision-taking. Such an approach may not comply with NPPF paragraph 122 which makes clear that local planning authorities should focus on whether the <b>development itself</b> is an acceptable use of the land, and the impact of the use, rather than the control of processes or emissions which are the subject of separate legislation (which local planning authorities should assume will operate effectively). In order to comply with the NPPF it will be necessary to apply the more balanced approach set out in emerging DM policies DM2 and DM11. These policies will have a clearer focus on the planning issues, acknowledging the interrelationship of neighbouring uses and recognising that impacts may need to be addressed from existing, as well as proposed, sources of air pollution (complying with NPPF para 109).</p>
EP6	Air Quality Management Areas	Yes	<p>This policy complies with paragraph 124 of the NPPF which requires policies to take into account the presence of Air Quality Management Areas and the cumulative impacts on air quality from individual sites in local areas, and that planning decisions should ensure that any new development in Air Quality Management Areas is consistent with the local air quality action plan. Emerging policy DM11 of the Development Management Policies Plan continues this approach albeit that the planning implications of AQMA designation are more clearly explained.</p>



<b>Policy</b>	<b>Subject Matter</b>	<b>Consistent with NPPF</b>	<b>NPPF coverage of issues</b>
EP8	Noise amelioration measures at Norwich Airport	Yes	This policy complies with paragraph 109 of the NPPF which states that the planning system should prevent both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of noise pollution.
EP10	Noise protection between different uses	Yes	The policy complies with the requirement in the core planning principles in paragraph 17 that plans should always seek to secure ... a good standard of amenity for all existing and future occupants of land and buildings. It also complies with paragraph 109 of the NPPF which states that the planning system should prevent both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of noise pollution
EP16	Water conservation and sustainable drainage systems	Yes	This policy complies with paragraph 94 of the NPPF which requires local authorities to adopt proactive strategies to mitigate and adapt to climate change, taking full account of flood risk, coastal change and water supply and demand considerations; and with paragraph 99 which states that local plans should take account of climate change over the longer term, including factors such as flood risk, coastal change, water supply and changes to biodiversity and landscape. In relation to sustainable drainage the policy would be superseded by the general requirements of the Floods and Water Management Act 2010 for approval of sustainable drainage systems by Norfolk County Council as lead local flood authority.
EP17	Protection of watercourses from pollution from stored materials, roads and car parks	Yes	This policy complies with paragraph 109 of the NPPF which states that the planning system should prevent both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of noise pollution.

Policy	Subject Matter	Consistent with NPPF	NPPF coverage of issues
EP18	High standard of energy efficiency for new development	Yes	This policy complies with paragraph 94 of the NPPF which requires local authorities to adopt proactive strategies to mitigate and adapt to climate change, taking full account of flood risk, coastal change and water supply and demand considerations; and with paragraph 95 requiring active support for energy efficiency improvements to existing buildings.
EP19	Renewable Energy development	Yes	The policy complies with the requirement in the core planning principles in paragraph 17 that planning should ... encourage the use of renewable resources (for example, by the development of renewable energy). It also complies with paragraph 95 requiring active support for energy efficiency improvements to existing buildings.
EP20	Sustainable use of Materials	Yes	The policy complies with the requirement in the core planning principles in paragraph 17 that planning should encourage the reuse of existing resources, including conversion of existing buildings
EP21	Network of material recycling sites	Yes	The policy complies with the requirement in the core planning principles in paragraph 17 that planning should encourage the reuse of existing resources.
EP22	High standard of amenity for residential occupiers	Yes	The policy complies with the requirement in the core planning principles in paragraph 17 that plans should always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings. It also complies with paragraph 109 requiring plans to prevent both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by, unacceptable environmental impact.

Policy	Subject Matter	Consistent with NPPF	NPPF coverage of issues
EMP1	Small scale business development	Yes	The policy provides the criteria for new small business development in centres and in residential areas. It complies with the core planning principle in paragraph 17 and the requirements of paragraphs 20 and 21 that planning should proactively drive and support sustainable economic development to meet business needs and deliver business units without placing burdens on business through the combined requirements of planning policy expectations. It also complies with paragraph 109 requiring plans to prevent both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by, unacceptable environmental impact.
EMP2	Expansion of existing businesses	Yes	The policy provides the criteria for expanding existing businesses. It complies with the core planning principle in paragraph 17 and the requirements of paragraphs 20 and 21 that planning should proactively drive and support sustainable economic development to meet business needs and deliver business units without placing burdens on business through the combined requirements of planning policy expectations. It also complies with paragraph 109 requiring plans to prevent both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by, unacceptable environmental impact.
EMP3	Protection of small business units and land reserved for their development	Yes	The policy provides the criteria covering the loss of small businesses to other It complies with the core planning principle in paragraph 17 and the requirements of paragraphs 20 and 21 that planning should proactively drive and support sustainable economic development to meet business needs and deliver business units without placing burdens on business through the combined requirements of planning policy expectations. It also complies with paragraph 109 requiring plans to prevent both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by, unacceptable environmental impact.

Policy	Subject Matter	Consistent with NPPF	NPPF coverage of issues
EMP4	Policy for Prime Employment Areas	Yes	This policy seeks to maintain certain employment sites in the city in employment use (all of which are in existing productive use) in the light of objectively identified needs. This approach is confirmed as appropriate by the Employment Growth and Sites and Premises Study 2008. It accords with the requirements of NPPF paragraph 21 for positive planning to deliver sustainable economic growth.
EMP5	Policy for General Employment Areas	Yes	This policy seeks to maintain certain employment sites in the city in employment use (all of which are in existing productive use) in the light of objectively identified needs. This approach is confirmed as appropriate by the Employment Growth and Sites and Premises Study 2008. It accords with the requirements of NPPF paragraph 21 for positive planning to deliver sustainable economic growth. However this policy is linked to policy EMP16 in relation to the accommodation of office development where it does not exceed 2000 sq.m gross. It should be noted that this aspect of EMP16 is not considered consistent with the sequential approach set out in paras 24-26 of the NPPF.
EMP6	Hall Road – area for motor vehicle showrooms	Yes	This site specific policy meets the requirements of section 1 of the NPPF by allocating land for a specific employment use to support sustainable economic growth.
EMP7	Policy for single employer sites	Yes	This policy meets the requirements of section 1 of the NPPF to support sustainable economic growth by promoting the retention of land used by large employers in their current or other employment uses.
EMP9	Deal Ground – allocation and conditions	Yes	These site specific policies meet the requirements of section 1 of the NPPF by allocating employment land to support sustainable economic growth.
EMP10	Land at Livestock Market – allocation and conditions		
EMP11	Land at Former Abattoir, Old Hall Road – allocation and conditions		
EMP12	Sites at Hurricane Way – allocation and conditions		

Policy	Subject Matter	Consistent with NPPF	NPPF coverage of issues
EMP13	Guardian Road – allocation for employment uses and conditions		
EMP14	Cremorne Lane (Utilities) – allocation and conditions		
EMP15	Kerrison Road / Hardy Road - redevelopment		
EMP16	Office Development – sequential test and criteria	Partially	The policy is only considered to be partially compliant with the NPPF insofar as aspects of the policy would appear to conflict with the application of the sequential approach to office development. With regard to major office development the policy suggests that first preference should be given to specified sites in the City Centre, then other sites within or adjacent to the City Centre and then certain specified “prime” employment areas. As there is little potential for accommodating this scale of office development within existing District Centres and the “prime” employment areas are generally more accessible than other employment areas, this is considered broadly consistent with the sequential approach set out in the NPPF. However, with regard to smaller scale office development the sequential approach would suggest that sites within or adjacent to other centres should be considered before employment land is released for office development. This aspect of the policy is therefore considered to be inconsistent with the NPPF and should no longer be applied to considering the acceptability of smaller scale office development outside of the City Centre.

<b>Policy</b>	<b>Subject Matter</b>	<b>Consistent with NPPF</b>	<b>NPPF coverage of issues</b>
EMP18	Development of high technology industries	Partially	The policy is only partially compliant with the NPPF. It complies with paragraph 21 which requires local authorities to plan positively for the location, promotion and expansion of clusters or networks of knowledge driven, creative or high technology industries. However it includes an exemption from the sequential test requirement where a proposal can show need to locate close to particular educational and research establishments. This would not allow full and proper consideration of reasonable alternative sites and not necessarily promote a sustainable or accessible pattern of development, contrary to NPPF paragraph 24 which requires preference to be given to accessible sites that are well connected to the town centre.
EMP19	Development of education and training establishments	Partially	This policy meets the requirements of paragraph 72 of the NPPF to proactively promote development which will widen choice in education and the core planning principle in paragraph 17 to support economic development (which includes education as a public and community use) by enabling educational development. However, the requirement for the provision of additional student accommodation in association with the growth of educational establishments may be considered to be onerous in view of the NPPF's emphasis on proactively driving and supporting sustainable economic development and focus on local planning authority requirements in relation to costs in paragraph 173. Therefore, members should consider on a case by case basis whether this element of the policy should be applied.

Policy	Subject Matter	Consistent with NPPF	NPPF coverage of issues
EMP20	Development at University of East Anglia	Partially	This policy meets the requirements of paragraph 72 of the NPPF to proactively promote development which will widen choice in education and the core planning principle in paragraph 17 to support economic development (which includes education as a public and community use) by enabling further growth within the UEA campus. It meets the requirements of paragraph 132 that development affecting designated heritage assets such as the listed buildings at UEA should give great weight to the asset's conservation. However, the requirement for the provision of additional student accommodation in association with the growth of the university may be considered to be onerous in view of the NPPF's emphasis on proactively driving and supporting sustainable economic development and focus on local planning authority requirements in relation to costs in paragraph 173. Therefore, members should consider on a case by case basis whether this element of the policy should be applied.
TVA1	Proposals for new visitor attractions – access	Yes	The policies are in line with paragraph 32 of the NPPF, which requires development to be accessible to all users and paragraph 57 which requires inclusive design.
TVA2	Measures to improve facilities for visitors by coach		
TVA3	Waterborne tourism and river moorings	Yes	By requiring public moorings and improved access to the river as part of riverside city centre developments, the RLP policy is in compliance with paragraph 23 of the NPPF which identifies tourism uses as a means of supporting vitality in town centres.
TVA4	Proposals for visitor attractions with priority areas and sequential approach	Yes	By identifying priority locations for tourism development in the city centre and applying a sequential approach to other tourism proposals, the RLP policy is in compliance with paragraph 23 of the NPPF which prioritises town centre locations for tourism uses.

Policy	Subject Matter	Consistent with NPPF	NPPF coverage of issues
TVA5	Locations for new hotels: identified sites	Yes, though largely redundant as saved policy	The RLP policy is in compliance with paragraph 23 of the NPPF which prioritises town centre locations for tourism uses. However, three hotel sites allocated through this policy have now been developed, one site has been superseded by the Northern City Centre Area Action Plan and the remaining site is now to be retained in its current use by Archant newspapers. This policy is therefore largely redundant.
TVA6	Other proposals for hotels and visitor accommodation	Yes	The policy is in line with the NPPF requirement in paragraph 23 that prioritises town centre locations for hotel uses.
TVA7	Resistance of loss of hotels and visitor accommodation	Yes	By seeking to retain hotels in sustainable locations, the policy conforms with paragraph 23 of the NPPF.
TVA8	Heritage Interpretation	Yes	The requirement for heritage interpretation where there is significant heritage interest is in line with the requirements of paragraphs 136 and 137 relating to the setting of heritage assets and 141 on information on the historic environment.
SHO2	Major convenience goods stores – limited to small size	No	The policy seeks to restrict new major convenience goods floorspace outside of specifically allocated sites to cases where proposed stores would be replacing a store in a less sustainable location: smaller stores up to 1200 sq.m would be accepted in accordance with the sequential test of policy SHO3. This policy is predicated on restricting new foodstore floorspace to a level which reflects a particular need and capacity for development at the time the plan was prepared: this has been superseded by more up to date evidence of retail capacity and significant growth in small scale food retailing. The requirement to demonstrate need for foodstores in any case no longer applies in national policy. Policy SHO2 is effectively redundant as RLP policy SHO3, emerging DM policy DM18 and NPPF paragraph 24 cover the issue sufficiently. To continue to apply the policy would be anti-competitive contrary to NPPF advice on supporting a competitive economy and promoting consumer choice.



Policy	Subject Matter	Consistent with NPPF	NPPF coverage of issues
SHO3	Locational conditions for new retail development – sequential test	Yes	The requirement for plans to include a sequential test for retail development as in this policy is set out in NPPF paragraph 24. Paragraph 26 of the NPPF accepts that local planning authorities may use a “proportionate, locally set floorspace threshold” when requiring impact tests for retail development outside defined centres, rather than the indicative 2500 sq.m threshold in the NPPF. In Norwich evidence has shown that a lower threshold can be justified as appropriate and proportionate, thus any application for retail development over the 1,000 square metre threshold in the RLP will require an impact test (paragraph 7.26).
SHO4	Retail development at King Street	Yes	These site specific policies comply with section 2 of the NPPF, which requires policies to ensure the vitality of town centres.
SHO6	Retail development at Westlegate/ Timberhill		
SHO7	Smaller scale expansion of retail units	Yes	This policy complies with section 2 of the NPPF, which requires policies to ensure the vitality of town centres.
SHO8	Contribution to Shopmobility scheme	Yes	This policy complies with section 2 of the NPPF, which requires policies to ensure the vitality of town centres. It complies with the requirements of NPPF paragraph 7 that planning has a social role to create a high quality built environment, with accessible local services and of paragraph 69 that planning policies and decisions should aim to achieve places which promote safe and accessible environments and developments.
SHO9	Development contribution to enhancement of public facilities in the vicinity	Yes	As for SHO8

Policy	Subject Matter	Consistent with NPPF	NPPF coverage of issues
SHO10	Changes of use in retail frontages in the Primary Retail Area	Yes	This policy complies with section 2 of the NPPF, which requires policies to ensure the vitality of town centres. In particular it addresses paragraph 23 which requires a clear definition of primary and secondary frontages in designated centres and the setting of policies that make clear which uses will be permitted in such locations. It also complies with paragraph 69 which promotes the creation of active street frontages
SHO11	Changes of use in retail frontages in the Secondary Retail Areas and Large District centre	Yes	As for SHO10
SHO12	Retail development in District or Local Centres	Partially	This policy complies partially with section 2 of the NPPF, which requires policies to ensure the vitality of centres. In particular it complies with paragraph 23 which requires local planning authorities to define a network and hierarchy of centres that is resilient to anticipated future economic changes and with paragraph 69 which promotes the creation of active street frontages. It does not however make any distinction in terms of acceptability between “in-centre” and “edge of centre” locations, whereas it is clear from paragraph 24 of the NPPF that the former should be given preference over the latter. Consequently the NPPF’s sequential test principles in paragraph 24 should apply in respect of any proposals where this choice needs to be made.
SHO13	Development of new District Centre at Hall Road	Yes	This site allocation policy complies with paragraph 23 which requires local planning authorities to define a network and hierarchy of centres that is resilient to anticipated future economic changes by enabling implementation of an identified gap in the network in south Norwich.
SHO14	Improvements to safety and attractiveness of District and Local centres	Yes	This policy complies with section 2 of the NPPF, which requires policies to ensure the vitality of centres. In particular it complies with paragraph 23 which requires local planning authorities to define a network and hierarchy of centres that is resilient to anticipated future economic changes and with paragraph 69 which promotes the creation of active street frontages.

<b>Policy</b>	<b>Subject Matter</b>	<b>Consistent with NPPF</b>	<b>NPPF coverage of issues</b>
SHO15	Changes of use within District and Local Centres	Yes	As for SHO14
SHO17	Retail outlets in petrol filling stations	Yes	This policy complies with section 2 of the NPPF, which requires policies to ensure the vitality of centres. In particular it complies with paragraph 23 which requires local planning authorities to define a network and hierarchy of centres that is resilient to anticipated future economic changes by preventing the development of unsustainably located large convenience retail units in petrol stations outside centres.
SHO18	Retail Warehouses – conditions to limit use	Yes	This policy complies with section 2 of the NPPF, which requires policies to ensure the vitality of centres. In particular it complies with paragraph 23 which requires local planning authorities to define a network and hierarchy of centres that is resilient to anticipated future economic changes by preventing the conversion of retail warehouses to large retail convenience units in unsustainable locations outside centres.
SHO20	Additional small scale markets	Yes	In allowing the development of small scale markets in the city centre, but restricting the development of new large markets in Norwich, the policy meets the requirements of NPPF paragraph 23 to retain and enhance existing markets ensuring they remain attractive and competitive or create new markets. It also complies with section 2 of the NPPF, which requires policies to ensure the vitality of centres.
SHO21	Historic public houses protection for last public house in residential area	Yes	The policy complies with the core planning principles in paragraph 17 of the NPPF which states that planning should deliver sufficient community facilities to meet local needs. It also supports the requirements of paragraph 69 that planning policies and should aim to achieve places which promote opportunities for meetings between members of the community and of paragraph 70 to plan positively for the provision and use of community facilities such as public houses.
SHO22	Food and drink uses and conditions on hot food takeaways	Yes	This policy complies with section 2 of the NPPF, which requires policies to ensure the vitality of centres.

<b>Policy</b>	<b>Subject Matter</b>	<b>Consistent with NPPF</b>	<b>NPPF coverage of issues</b>
HOU2	Mixed use development in city centre	Yes	The promotion of mixed use development is one of the core planning principles in paragraph 17 of the NPPF and is also promoted in paragraph 69 as a means of facilitating social interaction.
HOU5	Accessibility for wheelchair users	Yes	The policy complies with NPPF paragraph 50 which requires local planning authorities to plan for a mix of housing based on the needs of different groups in the community and paragraph 58 which requires plans to ensure development will function well over its lifetime.
HOU6	Contribution to community needs and facilities by housing developers	Yes	The policy requiring on site facilities or financial contributions from housing developments remains relevant as local implementation measures enabling open book negotiation of agreements reflect the requirements of paragraph 173 of the NPPF concerning development viability. The introduction of CIL will also be relevant to implementation of the policy.
HOU8	Committed housing development sites	Yes	This site specific policy meets the requirements of paragraph 47 of the NPPF by identifying sustainably located sites for housing development to meet objectively assessed need. Although the majority of the sites in this policy have been developed, the allocation for Three Score remains relevant.
HOU9	Sites allocated for mixed use development including housing	Yes	This site specific policy meets the requirements of paragraph 47 of the NPPF by identifying sustainably located sites for housing development to meet objectively assessed need. These allocations also comply with the NPPF promotion of mixed use development in the core planning principles (paragraph 17) and in paragraph 69. Although the majority of the sites in this policy have been developed, the undeveloped allocations, many in the King Street area, remain relevant.

<b>Policy</b>	<b>Subject Matter</b>	<b>Consistent with NPPF</b>	<b>NPPF coverage of issues</b>
HOU10	Sites identified for conversion of buildings to housing use or redevelopment	Yes	This site specific policy is NPPF compliant as it promotes the conversion of buildings (a core planning principle in paragraph 17) to housing in sustainable locations. However, it is partly redundant as the majority of the sites in this policy have been developed. In addition, emerging policy for the undeveloped allocation at Duke Street is mainly for offices whilst housing development at Goldsmith Street (including the site formerly known as Haslips Close) will no longer involve conversion as the original buildings have been demolished.
HOU11	Sites allocated for housing development conditional on provision of open space	Yes	This site specific policy meets the requirements of paragraph 47 of the NPPF by identifying sustainably located sites for housing development to meet objectively assessed need. In addition, it meets the requirements of paragraph 74 to meet assessed open space needs. Although three of the four the sites in this policy have been developed, the undeveloped allocation at the Norwich Community Hospital, Bowthorpe Road, remains partially relevant. Emerging site allocations continue to promote part of this site for housing development with some green space. This allocation complies with the NPPF requirement that housing should be sustainably located.
HOU12	Other sites allocated for housing development	Yes	This site specific policy meets the requirements of paragraph 47 of the NPPF by identifying sustainably located sites for housing development to meet objectively assessed need. Although the majority of the sites in this policy have been developed, the undeveloped allocations remain relevant. Emerging site allocations will continue to promote the great majority of the undeveloped sites.

<b>Policy</b>	<b>Subject Matter</b>	<b>Consistent with NPPF</b>	<b>NPPF coverage of issues</b>
HOU13	Proposals for new housing development on other sites	Partially	This site specific policy generally meets the requirements of paragraph 49 of the NPPF by enabling windfall development in locations in compliance with the presumption in favour of sustainable development in paragraph 14 of the NPPF. This states that “Local planning authorities should positively seek opportunities to meet the development needs of their area.” However, when assessing such windfall sites, members should note that this policy was drafted under previous government guidance. Residential gardens are no longer classified as brownfield land. Particular care should be taken in such cases to assess the likely impact of housing development on the character and amenity of the surrounding area as set out in clause 5 of policy HOU13 to be compliant with the thrust of national policy in paragraph 53 of the NPPF on resisting development in gardens where it would cause harm to local areas.
HOU15	Conversion to housing of vacant or underused parts of buildings	Yes	The policy complies with the core planning principle in paragraph 17 of the NPPF which encourages the reuse of existing resources, including conversion of existing buildings.
HOU16	Loss of residential accommodation resisted	Yes	This policy meets the requirements of paragraph 47 of the NPPF by preventing the loss of sustainably located housing which meets objectively assessed need.
HOU17	Conversion of small two-storey terraced houses to multiple occupation	Yes	This policy meets the requirements of paragraph 47 of the NPPF by preventing the loss of sustainably located housing which meets objectively assessed need for family accommodation. It is also in line with NPPF policy in paragraph 126 that development should make a positive contribution to local character and distinctiveness and paragraph 109 requiring plans to prevent both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by, unacceptable environmental impact.
HOU18	Conversion of larger properties to multiple occupation	Yes	The policy meets the requirements of paragraph 50 of the NPPF to plan for mixed communities and for a mix of housing based on the needs of different groups in the community.

<b>Policy</b>	<b>Subject Matter</b>	<b>Consistent with NPPF</b>	<b>NPPF coverage of issues</b>
HOU19	Residential institutions – criteria	Yes	This policy meets the requirements of paragraph 109 requiring plans to prevent both new and existing development suffering from an unacceptable environmental impact.
AEC1	Major arts and entertainment facilities – location and sequential test	Yes	This policy complies with section 2 of the NPPF, which requires policies to ensure the vitality of town centres and paragraph 37 which requires leisure uses to be located to minimise journey lengths.
AEC2	Local community facilities in centres	Yes	The policy complies with the core planning principles in paragraph 17 of the NPPF which states that planning should deliver sufficient community facilities to meet local needs. It also supports the requirements of paragraph 69 that planning policies and should aim to achieve places which promote opportunities for meetings between members of the community and of paragraph 70 to plan positively for the provision and use of community facilities.
AEC3	Loss of buildings for community use	Yes	The policy complies with paragraph 70 of the NPPF's requirement to plan positively for the provision and use of community facilities and to guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs. Proposals for the change of use of community buildings may be subject to the "Community Right to Challenge" providing local communities with the first option on the purchase of such buildings, though this is beyond the scope of the NPPF.
AEC4	Intermediate Care facility at Norwich Community Hospital site	Yes, though effectively redundant	This site specific policy is in compliance with the NPPF requirement in the core planning principles (paragraph 17) to take account of and support local strategies to improve health. However, it is now effectively redundant due to NHS Norfolk revising its operational plan for Norwich Community Hospital. As a result, the eastern part of the site is to remain in hospital use and the remainder in the west of the site is an emerging allocation for housing development with open space in the Site Allocation Plan.
AEC7	Childcare provision	Yes	The policy complies with paragraph 70 of the NPPF's requirement to plan positively for the provision and use of community facilities

<b>Policy</b>	<b>Subject Matter</b>	<b>Consistent with NPPF</b>	<b>NPPF coverage of issues</b>
SR1	Minimum standards for the provision of open space	Yes	The policy complies with the requirements of the core principles in paragraph 17 of the NPPF to deliver sufficient community facilities to meet local needs and of paragraph 70 to plan positively for the provision and use of recreational space. It also complies with paragraph 73, which requires open space policies to base on needs assessments.
SR2	Open space provision within each sector of the City	Yes	The policy complies with the requirements of the core principles in paragraph 17 of the NPPF to deliver sufficient community facilities to meet local needs and of paragraph 70 to plan positively for the provision and use of recreational space. It also complies with paragraph 73, which requires open space policies to base on needs assessments.
SR3	Criteria for development of Urban Greenspace and recreational open space	Yes	The policy complies with the requirements of the core principles in paragraph 17 of the NPPF to deliver sufficient community facilities to meet local needs and of paragraph 70 to plan positively for the provision and use of recreational space. It also complies with paragraph 73, which requires open space policies to base on needs assessments and with paragraph 74 concerning the loss of open space.
SR4	Provision of open space to serve new development	Yes	The policy complies with the requirements of the core principles in paragraph 17 of the NPPF to deliver sufficient community facilities to meet local needs and of paragraph 70 to plan positively for the provision and use of recreational space. It also complies with paragraph 73, which requires open space policies to base on needs assessments.
SR5	Allocation of specific areas for open space	Yes	This site specific policy meets the requirements of paragraph 74 of the NPPF to meet assessed open space needs. The majority of the sites covered by this policy have been developed for open space use with the exception of Old Bowthorpe Park, Bracondale Pit, Hobrough Lane and Norwich Community Hospital.
SR6	Dual use of facilities provided in educational and other establishments	Yes	The policy complies with the requirements of paragraph 70 of the NPPF to plan positively for the provision and use of shared recreational space.



<b>Policy</b>	<b>Subject Matter</b>	<b>Consistent with NPPF</b>	<b>NPPF coverage of issues</b>
SR7	Provision for children's equipped playspace	Yes	The policy complies with the requirements of the core principles in paragraph 17 of the NPPF to deliver sufficient community facilities to meet local needs and of paragraph 70 to plan positively for the provision and use of recreational space. It also complies with paragraph 73, which requires open space policies to base on needs assessments.
SR8	Protection of historic parks and gardens	Yes	In protecting registered parks and gardens from harmful development, this policy is in line with paragraph 132 of the NPPF.
SR9	Loss of allotments	Yes	The policy complies with the requirements of the core principles in paragraph 17 of the NPPF to deliver sufficient community facilities to meet local needs and of paragraph 70 to plan positively for the provision and use of recreational space. It also complies with paragraph 73, which requires open space policies to base on needs assessments and with paragraph 74 concerning the loss of open space.
SR10	Water recreation in Bowthorpe Southern Park	Yes	The policy complies with the requirements of paragraph 70 to plan positively for the provision and use of recreational space.
SR11	Riverside Walks – agreement with developers to provide/maintain	Yes	The policy complies with the requirements of paragraph 70 to plan positively for the provision and use of recreational space and with paragraph 117 which requires planning policies to promote the preservation, restoration and re-creation of ecological networks. The RLP policy is also in compliance with paragraph 23 of the NPPF which identifies the promotion of tourism as a means of supporting vitality in town centres.
SR12	Green Links network, including provision by developers	Yes	The policy complies with the requirements of paragraph 70 to plan positively for the provision and use of recreational space and with paragraph 117 which requires planning policies to promote the preservation, restoration and re-creation of ecological networks.
SR13	Locational considerations for indoor sports activities	Yes	The policy complies with the requirements of the core principles in paragraph 17 of the NPPF to deliver sufficient community facilities to meet local needs and of paragraph 70 to plan positively for the provision and use of recreational space. It also complies with paragraph 73, which requires open space policies to based on needs assessments.

<b>Policy</b>	<b>Subject Matter</b>	<b>Consistent with NPPF</b>	<b>NPPF coverage of issues</b>
SR14	Design and Amenity criteria for sports development	Yes	The policy complies with the requirements of paragraph 70 to plan positively for the provision and use of recreational space. It also complies with paragraph 109 requiring plans to prevent both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by, unacceptable environmental impact.
TRA1	Norwich Airport development	Yes	The policy complies with paragraphs 31 and 33 of the NPPF. These paragraphs require local authorities to support national strategies for the growth of airports, taking account of their role in serving business and leisure needs.
TRA2	Development within Airport boundary	Yes	As for TRA1
TRA3	Modal shift measures in support of NATS	Yes	This policy meets the requirement of the core planning principles in paragraph 17 of the NPPF to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable. It is also in compliance with paragraphs 29, 30, 31 and 32 and which require the development of strategies which locate development to reduce the need to travel and promote sustainable transport modes and the reduction of greenhouse gas emissions.
TRA5	Approach to design for vehicle movement and special needs	Yes	The policies are in line with paragraph 32 of the NPPF, which requires development to be accessible to all users and paragraph 57 which requires inclusive design. The policy also complies with the NPPF design requirements in section 7, most particularly in paragraph 58 to reflect local character.
TRA6	Parking standards – maxima (and Appendix 4)	Yes	The policy is in compliance with paragraphs 29, 30, 31 and 32 and which require the promotion of the development of strategies which locate development to reduce the need to travel and promote sustainable transport modes and the reduction of greenhouse gas emissions. The parking standards meet the requirements of paragraph 39 of the NPPF that local standards should be evidence based.

<b>Policy</b>	<b>Subject Matter</b>	<b>Consistent with NPPF</b>	<b>NPPF coverage of issues</b>
TRA7	Cycle parking standard (and Appendix 4)	Yes	This policy meets the requirement of the core planning principles in paragraph 17 of the NPPF to make the fullest possible use of cycling and paragraphs 29, 30, 31 and 32 which require the development of strategies which promote sustainable transport modes and the reduction of greenhouse gas emissions.
TRA8	Servicing provision	Yes	The policy complies with the requirement in the core planning principles in paragraph 17 that plans should always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings. It also complies with paragraph 35 which requires developments should to be designed accommodate the efficient delivery of goods and supplies.
TRA9	Car free housing - criteria	Yes	The policy is in compliance with paragraphs 29, 30, 31 and 32 and which require the promotion of the development of strategies which locate development to reduce the need to travel and promote sustainable transport modes and the reduction of greenhouse gas emissions. The car free housing criteria meet the requirements of paragraph 39 of the NPPF that local standards should be evidence based.
TRA10	Contribution by developers to works required for access to the site	Yes	The requirement for developers to fund on site works remains unaffected by the NPPF.
TRA11	Contributions for transport improvements in wider area	Yes	The requirement for off site funding of transport infrastructure remains relevant and is in accordance with the promotion of sustainable transport in paragraphs 29, 30, 31 and 32. Paragraph 173 states that the scale of obligations should not threaten development viability. Since Norwich City Council operates an open book viability assessment facility, and will reduce payments when appropriate, this element of the NPPF is addressed. This will be superseded by CIL payments.
TRA12	Travel Plans for employers and organisations in the City	Yes	This is in compliance with paragraph 32 of the NPPF which requires travel plans for all significant developments.

<b>Policy</b>	<b>Subject Matter</b>	<b>Consistent with NPPF</b>	<b>NPPF coverage of issues</b>
TRA13	Integrated transport strategy and interchange facilities	Yes	This policy meets the requirement of the core planning principles in paragraph 17 of the NPPF to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable. It is also in compliance with paragraphs 29, 30, 31 and 32 and which require the development of strategies which locate development to reduce the need to travel and promote sustainable transport modes and the reduction of greenhouse gas emissions.
TRA14	Enhancement of the pedestrian environment and safe pedestrian routes	Yes	This policy meets the requirement of the core planning principles in paragraph 17 of the NPPF to make the fullest possible use of walking. It is in compliance with paragraphs 29, 30, 31 and 32 and which require the development of strategies which locate development to reduce the need to travel and promote sustainable transport modes and the reduction of greenhouse gas emissions. This policy complies with section 2 of the NPPF, which requires policies to ensure the vitality of centres.
TRA15	Cycle network and facilities	Yes	This policy meets the requirement of the core planning principles in paragraph 17 of the NPPF to make the fullest possible use of cycling and paragraphs 29, 30, 31 and 32 which require the development of strategies which promote sustainable transport modes and the reduction of greenhouse gas emissions.
TRA16	Public transport measures to increase efficiency and attractiveness	Yes	This policy meets the requirement of the core planning principles in paragraph 17 of the NPPF to make the fullest possible use of public transport. It is also in compliance with paragraphs 29, 30, 31 and 32 to reduce the need to travel and promote sustainable transport modes and the reduction of greenhouse gas emissions.
TRA18	Major road network	Yes	This policy is in compliance with paragraph, 31 and 32 and which requires policies to implement transport strategies. This policy helps to implement the NATS strategy.

<b>Policy</b>	<b>Subject Matter</b>	<b>Consistent with NPPF</b>	<b>NPPF coverage of issues</b>
TRA19	Protection of existing Airport park and ride site.	Yes	The site specific policy for an existing Park and Ride site This policy meets the requirement of the core planning principles in paragraph 17 of the NPPF to make the fullest possible use of public transport. It is also in compliance with paragraphs 29, 30, 31 and 32 to reduce the need to travel and promote sustainable transport modes and the reduction of greenhouse gas emissions.
TRA21	Public off street parking	Yes	This policy meets the requirement of the core planning principles in paragraph 17 of the NPPF to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable. It is also in compliance with paragraphs 29, 30, 31 and 32 and which require the development of strategies which locate development to reduce the need to travel and promote sustainable transport modes and the reduction of greenhouse gas emissions.
TRA22	Information for drivers on car parking (developer contributions to variable message signing system)	Yes	This policy is in compliance with paragraph, 31 and 32 and which requires policies to implement transport strategies. This policy helps to implement the NATS strategy.
TRA23	Alternative fuels and provision for appropriate technology	Yes	The policy is in line with the requirements of paragraph 35 to incorporate facilities for charging plug-in and other ultra-low emission vehicles.
TRA24	Design of development in City Centre to take account of sustainable transport needs	Yes	This policy meets the requirement of the core planning principles in paragraph 17 of the NPPF to make the fullest possible use of public transport, cycling and walking. It is in compliance with paragraphs 29, 30, 31 and 32 and which require the development of strategies which locate development to reduce the need to travel and promote sustainable transport modes and the reduction of greenhouse gas emissions. This policy complies with section 2 of the NPPF, which requires policies to ensure the vitality of centres.

<b>Policy</b>	<b>Subject Matter</b>	<b>Consistent with NPPF</b>	<b>NPPF coverage of issues</b>
TRA26	Design and materials in streetscape	Yes	The policy complies with the NPPF design requirements in section 7, most particularly in paragraph 58 to reflect local character and use local materials. It is also in line with NPPF policy in paragraph 126 that new development, taking account of the historic environment, should make a positive contribution to local character and distinctiveness.
CC1	Castle Meadow - non-retail uses	Yes	This policy complies with the NPPF promotion of mixed use development in the core planning principles in paragraph 17 and in paragraphs 69. The inclusion of housing without parking provision in locations with good public transport complies with paragraph 39 of the NPPF. It also complies with section 2 of the NPPF, which requires policies to ensure the vitality of town centres. By supporting the role of key role of Castle Meadow for buses, it complies with the core planning principle in paragraph 17 to make the fullest possible use of public transport.
CC2	Chantry Car Park Site - mix of uses and conditions	Yes	This site specific policy complies with the NPPF promotion of mixed use development in the core planning principles (paragraph 17) and in paragraph 69 and with section 2 of the NPPF, which requires policies to ensure the vitality of town centres. The policy also meets the requirements of paragraph 47 of the NPPF by identifying sustainably located sites for housing development to meet objectively assessed need.
CC3	Cultural and Civic Area - appropriate uses	Yes	The policy's requirement for leisure, cultural, hotel and food and drink uses in this area, which lies to the west of the St Stephens/Market Place area and includes Chapelfield Gardens, Theatre Street and Bethel Street. remains relevant. This policy complies with section 2 of the NPPF, which requires policies to ensure the vitality of town centres.
CC4	Barn Road car park site – mix of uses and conditions	Yes	This site specific policy complies with the NPPF promotion of mixed use development in the core planning principles (paragraph 17) and in paragraph 69 and with section 2 of the NPPF, which requires policies to ensure the vitality of town centres. The policy also meets the requirements of paragraph 47 of the NPPF by identifying sustainably located sites for housing development to meet objectively assessed need.

<b>Policy</b>	<b>Subject Matter</b>	<b>Consistent with NPPF</b>	<b>NPPF coverage of issues</b>
CC5	Quayside site - mix of uses and conditions	Redundant as saved policy	This site allocation policy is redundant as the development has taken place.
CC8	Site at Whitefriars/ Barrack Street – mix of uses and requirements	Yes, but partly redundant as saved policy	This policy is partly redundant as the main part of the development, new offices and a pedestrian bridge, has taken place. The policy's requirement for residential development and a multi storey car park on the remainder of the site remain relevant. This policy complies with the NPPF promotion of mixed use development in the core planning principles in paragraph 17 and in paragraphs 69. It also complies with section 2 of the NPPF, which requires policies to ensure the vitality of town centres.
CC9	Mountergate/Rose Lane sites - mix of uses and conditions	Yes, but partly redundant as saved policy	This policy is partly redundant as a small part of the development, housing and a riverside walk at Baltic Wharf, has taken place. However, the policy's requirement for office, residential, restaurants or hot food uses and leisure development on the remainder of the site remains relevant. This policy complies with the NPPF promotion of mixed use development in the core planning principles in paragraph 17 and in paragraphs 69. It also complies with section 2 of the NPPF, which requires policies to ensure the vitality of town centres.
CC10	Bus Station area - mix of uses and conditions	Yes, but partly redundant as saved policy	This policy is partly redundant as the main part of the development, the provision of a new bus station, has taken place and part of the remainder of site has been developed for institutional accommodation. The policy's requirement for residential development on the remainder of the site remains relevant. It complies with the NPPF's focus in paragraph 39 on providing housing with limited parking provision in sustainable locations with good access to public transport.

<b>Policy</b>	<b>Subject Matter</b>	<b>Consistent with NPPF</b>	<b>NPPF coverage of issues</b>
CC11	King Street Area - regeneration strategy	Yes	This site specific policy complies with the NPPF promotion of mixed use development in the core planning principles (paragraph 17) and in paragraph 69 and with section 2 of the NPPF, which requires policies to ensure the vitality of town centres. The policy meets the requirements of paragraph 47 of the NPPF by identifying sustainably located sites for housing development to meet objectively assessed need. It also meets the requirements of paragraph 132 that development affecting designated heritage assets such as the listed buildings on King Street should give great weight to the asset's conservation.
CC12	Sites at St Anne's Wharf - mix of uses and conditions	Yes	This site specific policy complies with the NPPF promotion of mixed use development in the core planning principles (paragraph 17) and in paragraph 69 and with section 2 of the NPPF, which requires policies to ensure the vitality of town centres. The policy also meets the requirements of paragraph 47 of the NPPF by identifying sustainably located sites for housing development to meet objectively assessed need.
CC13	Pedestrian Bridge requirement to link Riverside to City Centre	Redundant as saved policy	This policy is redundant as the bridge has been built.
CC14	Land adjoining the Football Club - mix of uses and conditions	Largely redundant as saved policy	This policy is largely redundant as part of the development has taken place and flats on the remainder are currently being built.



### **Northern City Centre Area Action Plan**

<b>Policy</b>	<b>Subject Matter</b>	<b>Consistent with NPPF</b>	<b>NPPF coverage of issues</b>
LU1	Mixed use development to promote regeneration and a distinctive identity	Yes	The promotion of mixed use development is one of the core planning principles in paragraph 17 of the NPPF and is also promoted in paragraph 69 as a means of facilitating social interaction. The policy also complies with section 2 of the NPPF, which requires policies to ensure the vitality of centres .
LU2	Large district centre	Yes	This policy complies with section 2 of the NPPF, which requires policies to ensure the vitality of centres. In particular it addresses paragraph 23 covering retail frontages in designated centres. It also complies with paragraph 69 which promotes the creation of active street frontages.
LU3	Residential development	Yes	This policy meets the requirements of paragraph 47 of the NPPF providing for housing development in sustainable locations to meet objectively assessed need. In addition, it meets the requirements of paragraph 74 to meet assessed open space needs.
LU4	Community identity and changing perceptions of the area	Yes	The policy requiring on site facilities or financial contributions from developments in the core area of the Northern City Centre remains relevant as local implementation measures enabling open book negotiation of agreements reflect the requirements of paragraph 173 of the NPPF concerning development viability. The introduction of CIL will also be relevant to implementation of the policy.
MV1	Sustainable Transport	Yes	This policy meets the requirement of the core planning principles in paragraph 17 of the NPPF to make the fullest possible use of public transport, walking and cycling. It is also in compliance with paragraphs 29, 30, 31 and 32 and which require the development and implementation of strategies which locate development to reduce the need to travel and promote sustainable transport modes and the reduction of greenhouse gas emissions.

Policy	Subject Matter	Consistent with NPPF	NPPF coverage of issues
PR1	New Squares	Yes	This policy complies with section 2 of the NPPF, which requires policies to ensure the vitality of town centres. It also complies with paragraph 69 which promotes the creation of active street frontages. In design terms, the creation of new squares complies with the NPPF design requirements in section 7, most particularly in paragraph 58 and 126 to reflect local character and distinctiveness.
PR2	Enhancement of space under flyover	Yes	This policy complies with section 2 of the NPPF, which requires policies to ensure the vitality of town centres. It also complies with paragraph 69 which promotes the creation of active street frontages.
TU1	Design for the historic environment	Yes	The policy complies with the NPPF design requirements in section 7, most particularly in paragraph 58 to reflect local character and use local materials. It is also in line with NPPF policy in paragraph 126 that new development, taking account of the historic environment, should make a positive contribution to local character and distinctiveness.
TU2	Key landmarks and views; building massing and form	Yes	The policy complies with the NPPF design requirements in section 7, most particularly in paragraph 58 to reflect local character. It is also in line with NPPF policy in paragraph 126 that new development, taking account of the historic environment, should make a positive contribution to local character and distinctiveness.
ENV1	Climate change mitigation and adaptation	Yes	This policy complies with paragraph 94 of the NPPF which requires local authorities to adopt proactive strategies to mitigate and adapt to climate change. The policy is in compliance with the requirement in the core planning principles in paragraph 17 that planning should ... encourage the use of renewable resources (for example, by the development of renewable energy). It also complies with paragraph 95 requiring active support for energy efficiency improvements to existing buildings.

<b>Policy</b>	<b>Subject Matter</b>	<b>Consistent with NPPF</b>	<b>NPPF coverage of issues</b>
AS1	Anglia Square mixed use redevelopment	Yes	This site specific policy complies with the NPPF promotion of mixed use development in the core planning principles (paragraph 17) and in paragraph 69 and with section 2 of the NPPF, which requires policies to ensure the vitality of town centres. The policy also meets the requirements of paragraph 47 of the NPPF by identifying sustainably located sites for housing development to meet objectively assessed need.
AS2	Anglia Square retail development	Yes	This site specific policy complies with section 2 of the NPPF, which requires policies to ensure the vitality of centres. In particular it complies with paragraph 23 which requires local planning authorities to promote an appropriate scale of development in relation to the established hierarchy of centres and with paragraph 69 which promotes the creation of active street frontages.
AS3	Anglia Square design	Yes	This site specific policy complies with section 2 of the NPPF, which requires policies to ensure the vitality of centres. It is also in line with NPPF policy in paragraph 126 that new development, taking account of the historic environment, should make a positive contribution to local character and distinctiveness.
AS4	Anglia Square access and parking	Yes	This policy meets the requirement of the core planning principles in paragraph 17 of the NPPF to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable. It is also in compliance with paragraphs 29, 30, 31 and 32 which require the development of strategies which locate development to reduce the need to travel and promote sustainable transport modes and the reduction of greenhouse gas emissions.
WW1	Land west of Whitefriars – mixed use redevelopment.	Yes	This site specific policy complies with the NPPF promotion of mixed use development in the core planning principles (paragraph 17) and in paragraph 69 and with section 2 of the NPPF, which requires policies to ensure the vitality of town centres. The policy also meets the requirements of paragraph 47 of the NPPF by identifying sustainably located sites for housing development to meet objectively assessed need.

<b>Policy</b>	<b>Subject Matter</b>	<b>Consistent with NPPF</b>	<b>NPPF coverage of issues</b>
SMW1	St Mary's Works – mixed use redevelopment	Yes	As above for WW1.
SC1	St Crispin's/Pitt Street – mixed use redevelopment.		
BP1	Beckham Place – mixed use redevelopment		
PS1	Peacock Street	Yes	This allocation for small business units complies with the requirement in paragraphs 17, 20 and 21 that planning should proactively drive and support sustainable economic development to meet business needs and deliver business units. It also complies with paragraph 109 requiring plans to prevent both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by, unacceptable environmental impact.
OSN1	The Talk Nightclub, Oak Street	Yes	These site specific policies meet the requirements of paragraph 47 of the NPPF by allocating a sustainably located site for housing development to meet objectively assessed need.
OSN2	Land at 123-161 Oak Street		
OSN3	Sussex House, St Martins at Oak Wall Lane		
NS1	Leonard Street	Policy redundant	This policy is redundant as the play space has been developed.
WN1	Friar's Quay – mixed use development	Yes	As above for WW1.
WN2	Bulsare Warehouse site	Yes	As above for OSN1 -3.
WN3	Mary Chapman Court	Yes	As above for OSN1 -3.

**Norfolk Structure Plan (adopted 1999)**

<b>Policy</b>	<b>Subject Matter</b>	<b>Consistent with NPPF</b>	<b>NPPF coverage of issues</b>
EC 10	The change of use of hotels, holiday parks, chalets, camping and caravan sites	Partially	This policy, covering change of use of hotels and holiday uses, should be read in conjunction with RLP policy TVA7. By seeking to retain hotels and camp sites in current uses, the policy could be viewed as anti-competitive and therefore not in compliance with the aims of section 1 of the NPPF.
T 2	Transport and new development	Yes	The requirement for off-site funding of transport infrastructure in this policy, which is very close in content to RLP TR11, remains relevant. It is in accordance with the promotion of sustainable transport in paragraphs 29, 30, 31 and 32. Paragraph 173 states that the scale of obligations should not threaten development viability. Since Norwich City Council operates an open book viability assessment facility, and will reduce payments when appropriate, this element of the NPPF is addressed. This will be superseded by CIL payments.
T17	General aviation	Yes	This policy allowing development of small-scale business aviation or recreational flying at existing airfields is compliant with the NPPF but should be read in conjunction with RLP TR1. The RLP policy complies with paragraphs 31 and 33 of the NPPF requiring local authorities to support national strategies for the growth of airports, taking account of their role in serving business and leisure needs.
RC8	Non-renewable energy power station development	Yes	This policy complies with NPPF paragraph 109 requiring plans to prevent both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by, unacceptable environmental impact. However, power stations of over 50 MW can be dealt with under the national infrastructure planning regime.

Notes: Site allocation policies to be supplemented on submission of the site allocation plan and superseded on its adoption:

CC2 : This policy will be superseded by policy CC29 of the emerging Site Allocation plan which provides for a mix of uses on this site, including retailing and leisure uses, but does not include housing. This is based on evidence from the St Stephens Masterplan and reflects the increasing focus in JCS policy 11 on development which supports the city centre's role as a regional centre.

Other policies likely to be superseded: CC4,8,9,10,11, 12 and 14. Also other site allocations in HOU and EMP policies.

Also consider how this will apply to DM policies.