



Sustainable development panel

Date: Wednesday, 13 November 2019

Time: 09:30

Venue: Mancroft room, City Hall, St Peters Street, Norwich, NR2 1NH

Committee members:*

Councillors:

Stonard (chair)

Maguire (vice chair)

Carlo

Davis

Giles

Grahame

Lubbock

Maxwell

Stutely

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Agenda

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Purpose - To consider the Regulation 10A review of policies in the Development Management Policies and the Site Allocations and Site Specific Policies plans.

Date of publication: **Tuesday, 05 November 2019**



Sustainable Development Panel

09:30 to 10:10

16 October 2019

Present: Councillors Stonard (chair), Carlo, Giles, Grahame, Lubbock, Maxwell and Stutely

Apologies: Councillors Davis and Maguire

1. Declarations of Interest

There were no declarations of interest.

2. Minutes

RESOLVED to approve the accuracy of the minutes of the meeting held on 16 October 2019.

3. Purpose-built Student Accommodation in Norwich

(A revised version of Appendix 2, that showed the proposed updates to the guidance note, was circulated at the meeting.)

(The planning policy team leader explained that Sam Walker, planner (policy) had been seconded to the county council to work on the Greater Norwich Local Plan and had returned to present the report. She introduced Charlotte Hounsell who was his replacement and Joy Brown, senior planner, who would also be joining the planning policy team.)

The planner (policy) presented the report and outlined the changes to the report in reflect the consultation responses. The planning policy team leader said that there was a further amendment to reflect the mobile bike share scheme around paragraphs 5.17 and 5.18. In reply to a question from the chair, the planning policy team leader explained that the document was guidance rather than a supplementary planning document (SPD) and therefore the comments were in the spirit of encouraging cycle sharing for the benefit of the future residents and was predicated on larger purpose-built student accommodation developments.

Discussion ensued in which the planner (policy) and the planning team leader answered members' questions. Members expressed concern that student study rooms should have room for a study desk. The planner explained that if room sizes were set it would reduce the scope of the development. However the guidance sought to ensure that where there were smaller bedrooms study facilities were provided elsewhere in the building. He referred to paragraph 5.34 and said that it was not about reducing size but to make sure that there was study provision for

students' needs. The guidance was not intended to be prescriptive. However members commented on the concerns raised at planning applications committee regarding student accommodation room sizes and that the committee could benefit from guidance. Members also concurred that all student rooms should have room for a desk for private study and that an alternative of providing desks in communal areas or reliance on library use was not acceptable. The panel agreed that communal amenity space and kitchens was important for student well-being. The planner (policy) agreed to remove the suggested addition to paragraph 5.34 providing greater flexibility about room sizes from the advice note, to ensure that rooms are of a sufficient size to include a study desk. A member commented on ensuring that all communal spaces were accessible to wheelchair users and suggested that the term "accessible" was inserted before all references to communal areas. The planner (policy) referred to the reference in paragraph 5.34 and said that this was referred to under bullet point 4, final sentence – "Circulation, social and communal spaces should also be accessible." Members were also advised that DDA compliance was covered by building regulations.

Under paragraph 5.43 members considered that for clarification "student finances" should be referred to as "student maintenance loan".

In reply to a question, the planner (policy) explained that developers would need to demonstrate that schemes "would not saturate the market". An application would be unlikely to be supported unless the applicant could provide evidence that it was required. The expectation was that schemes would come forward providing a range of provision including low cost affordable units. The planning policy team leader pointed out that measures to improve affordability of student accommodation that should be considered by applicants providing purpose built student accommodation was set out in paragraph 5.44.

Members were advised that paragraph 5.45 had been deleted from the guidance because it was not appropriate to require or expect developers to demonstrate that they had contacted higher education institutions or student union bodies. Universities or other higher education institutions could have other priorities or be in the process of developing their own accommodation. The planning policy team leader said that the advice note proposes creation of a working group involving the council and local higher education institutions in order to share best practice and knowledge. The planner (policy) said that rents of private purpose built student accommodation reflected the prices charged by higher education institutions. This would cascade to other types of student accommodation. Members noted that the objective was to encourage a wide range of student accommodation as possible though wider planning policy. It was suggested that wording in paragraph 5.40 should be changed from "advisable" to "strongly advised."

Further discussion ensued on the demonstration of need for student accommodation and a member suggested that it would be beneficial if developers were in contact with higher education institutions. The planner (policy) said that the intention was that developers and higher education institutions engaged with each other.

The chair in conclusion praised the planner (policy) for an excellent piece of work which would ensure that there was a structure to provide good quality accommodation for students, including affordable accommodation, which would take the pressure off the private sector houses in multiple-occupation and free up

accommodation for young professionals and family use. Members joined with the chair in wishing the planner (policy) good luck on his promotion and secondment.

RESOLVED, having noted the summary of consultation responses and the tracked changes in the draft guidance note (Appendix 2, revised version circulated at the panel meeting) to recommend the guidance note on Purpose-built Student Accommodation in Norwich to cabinet for adoption, subject to the changes to text as minuted above.

CHAIR

Report to Sustainable development panel

13 November 2019

Report of Director of resources

Subject Terms of reference

Item

4

Purpose

To update the terms of reference of the sustainable development panel following the creation of the climate and environment emergency executive panel (CEEEP).

Recommendation

To:

- (1) note that the council has established a climate and environment emergency executive panel (CEEEP);
- (2) approve the amendment of the terms of reference for the sustainable development panel by transferring the following terms of reference to the CEEEP:
 - (a) monitoring the progress of the council's environmental strategy and carbon management programme;
 - (b) consider how the council's environmental strategy, carbon reduction programme and associated policies tackle the issues of climate change, carbon reduction and sustainable development;
 - (c) overseeing the implementation of the action plan for the integrated waste management strategy;
 - (d) the development of specific environmental strategies including trees, parks, play areas and natural areas;
- (3) approve the revised terms of reference as set appendix 6 of the report.

Corporate and service priorities

The report helps to meet the corporate priority for great neighbourhoods, housing and environment, inclusive economy, and people living well.

Financial implications

None

Ward/s: All wards

Cabinet member: Cllr Stonard – sustainable and inclusive growth

Contact officers

Stuart Guthrie, democratic and elections manager	01603 212055
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Anton Bull, director of resources	01603 212326
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Background documents

None

Report

Background

1. At a meeting of council on Tuesday, 23 July 2019, members agreed to the formation of a climate and environment emergency executive panel, which is an advisory group to cabinet.
2. The following terms of reference were agreed:

The climate emergency and environment executive panel will:

- a) consider climate change and sustainability including social and economic issues in both the short and the long term in order to gather information and generate reports to advise cabinet on:
 - i. their work to make the city of Norwich carbon neutral as soon as possible, considering both production and consumption emissions
 - ii. the continuation and expansion of its work of building climate-change resilient social housing
 - iii. their continued promotion of climate-change resilient planning and building
 - iv. working with other local authorities to determine and implement best practice methods to limit global warming to less than 1.5°C;
 - v. Continuing and expanding their work with partners across the city and region to deliver this new goal through all relevant strategies and plans, framed by the 2040 City Vision.
 - b) be drawn from all parties in a politically balanced manner and composed of 7 members
 - c) consider:
 - i. what the council is doing now
 - ii. what it plans to do
 - iii. what it might do
3. The terms of reference for the sustainable development panel were agreed at its first meeting on 17 February 2011. The terms of reference were based on previous working parties to provide continuance.

Proposal

4. Currently, the sustainable development panel includes points in its terms of reference which would be better suited to the climate emergency and environmental executive panel.
5. It is proposed that the panel adopts the following points from the sustainable development panel terms of reference:
 - (a) monitoring the progress of the council's environmental strategy and carbon management programme;

- (b) how the council's environmental strategy, carbon reduction programme and associated policies tackle the issues of climate change, carbon reduction and sustainable development.
- (d) overseeing the implementation of the action plan for the integrated waste management strategy
- (e) the development of specific environmental strategies including trees, parks, play areas and natural areas

Conclusion

6. The terms of reference for the sustainable development will therefore be as set out below:

Sustainable Development Panel

Terms of Reference

To consider and if required, to make recommendations to cabinet or any relevant committee/body, on sustainability issues facing the council, including:-

1. An overview of government policy relating to sustainable development and the implications for the council and the city.
2. Preparation and implementation of planning policy including Local Development Framework.
3. Responses to relevant planning consultations.
4. Issues arising from the implementation and monitoring of planning policies.
5. The council's position and response to transport policy and strategy development, including the Norwich Area Transportation Strategy.
6. The development of specific sustainable transport initiatives.

Report to	Sustainable development panel 13 November 2019	Item
Report of	Director of regeneration and development	5
Subject	Regulation 10A review of Norwich's Development Management Policies and Site Allocations plans	

Purpose

To consider the Regulation 10A review of policies in the Development Management Policies and the Site Allocations and Site Specific Policies plans.

Recommendation

To recommend to cabinet that it endorses the Regulation 10A review of local plan policies and the proposal to commence review of the DM Policies plan following the Regulation 19 stage of the Greater Norwich Local Plan, likely to be in Spring 2021, subject to further consideration as part of the 2021-22 budget process.

Corporate and service priorities

The report helps to meet the corporate priority great neighbourhoods, housing and environment, inclusive economy, and people living well.

Financial implications

Review of the DM Policies plan will have financial implications for the council although this is anticipated as all plans require periodic review. The budget implications will need to be considered as part of next year's budget review.

Ward/s: All Wards

Cabinet member: Councillor Stonard - Sustainable and inclusive growth

Contact officers

Judith Davison, Planning policy team leader	01603 212529
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Background documents

None

Report

Introduction

1. The purpose of this report is to review Norwich's Development Management Policies Plan ([DM policies plan](#)) and Site Allocations and Specific Policies plan ([Site allocations plan](#)) in accordance with Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2017, to conclude whether a review is necessary and, if so, what form it should take. The review needs to be completed by 30 November 2019.
2. The 2017 regulations introduce a statutory requirement, under Regulation 10A, that from 6 April 2018 local planning authorities must review their local plan within five years of the date of adoption. The purpose is to ensure that local plans are kept up to date and are responding to changing local needs and circumstances. The regulations state that, where an authority reviews a document but decides not to update it, they must publish their reasons.
3. This new requirement is reflected in the National Planning Policy Framework (2019) at paragraph 33 which states that "Policies in local plans and spatial development strategies should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary."
4. Guidance about reviewing policies is contained within [Planning Practice Guidance](#) (PPG) which was updated in March 2019. This provides more detail on what such a review should address, including for example changing local circumstances such as when the local housing need figure has changed significantly, success of policies against local plan indicators as set out in the Annual Monitoring Report (AMR), planning appeals performance, where there are relevant changes in national policy, and whether any new social, environmental or economic priorities may have arisen (PPG paragraph 065). If, after assessing its Local Plan policies, a local planning authority needs to amend one or more policies, it should update its Local Development Scheme to set out the timetable for when these amendments will be consulted upon and examined. PPG paragraph 070 clarifies that local planning authorities will not necessarily need to revise their entire plan and may publish a list of policies they will update and those they do not consider need updating.
5. The Planning Advisory Service (PAS) has very recently published more detailed guidance ([Local Plan Route Mapper](#), October 2019) to assist with the review process and with the development of local plans generally. This stresses that there is no definitive way for undertaking a review of local plan policies but that it provides a useful starting point. The guidance notes that the outcome of a review could potentially range from small-scale partial update of specific policies through to a full update of a local plan. It stresses that local planning authorities have significant discretion to determine the most appropriate way forward for their local plan review.

Norwich's local planning documents

6. The development plan for Norwich comprises the following documents:
 - Joint Core Strategy for Broadland, Norwich and South Norfolk (the JCS) adopted in March 2011, amendments adopted January 2014;
 - Norwich Site Allocations and Site Specific Policies Local Plan (the Site allocations plan) adopted December 2014; and
 - Norwich Development Management Policies Local Plan (the DM policies plan) adopted December 2014.
7. The policies in the JCS are currently being reviewed as part of the development of the Greater Norwich Local Plan (GNLP) by the three Greater Norwich authorities and Norfolk County Council, and will be superseded by the GNLP upon its adoption, likely to be in 2022. The GNLP also includes site allocations across the three districts and again it will supersede the site allocations plans for Broadland, Norwich and South Norfolk upon its adoption.
8. The exercise to undertake a Regulation 10A review therefore applies to both the DM Policies and Site allocations plans but not to the JCS as the latter is currently being reviewed through preparation of the GNLP. As both local plan documents were adopted on 1st December 2014 the review needs to be completed before the end of November 2019. There is currently no need to update the current Statement of Community Involvement as this was adopted in November 2016 and therefore does not need review until 2021.
9. This report of this review, alongside any comments made by Sustainable Development Panel at the meeting on 13 November 2019, will be reported to Cabinet meeting on the same day. This will enable a decision on the outcome of the review and the recommended way forward to be made in advance of the deadline of 30 November 2019.

Review process and scope

10. The approach taken by the council in reviewing its local plan policies reflects the PPG and the PAS guidance.
 - a. A number of local plan review factors have been considered to ensure that the plans are still on target to meet their objectives and the strategic policy approach is still appropriate. These factors are considered at paragraphs 13-19 below. (As the DM policies plan does not set a housing target for Norwich, this review does not include assessment of change in local housing need numbers, whether the council has a 5 year supply of housing land, and whether it is meeting its housing delivery targets including for affordable housing. Housing targets for Norwich and Greater Norwich as a whole are set out in the Joint Core Strategy and in the future will be included in the GNLP. The 5 year supply of housing and the housing delivery target are calculated jointly for Greater Norwich as a whole.);

- b. In addition, individual policies have been assessed against the revised NPPF, having regard to relevant evidence including the Annual Monitoring Report and planning appeal decisions and changing local circumstances. It should be noted that not all policies age at the same rate; some will remain valid for many years whereas others may be more susceptible to changing circumstances and therefore may require review at an earlier stage. The reviews for the respective local plans (the DM policies plan and Site allocations plan) are set out at appendix 1 and 2, and discussed below at paragraphs 20-26.
11. The PPG expects local planning authorities to have due regard to the Duty to Cooperate when undertaking a review of policies. Several policies have cross boundary implications including policies DM26 (Development at the University of East Anglia) and DM27 (Norwich Airport). The guidance notes that often the most significant cross boundary issues relate to housing numbers but this is not the case for Norwich's local plans as the housing target is set by the higher tier plan (the JCS and the emerging GNLP). It should also be noted that extensive joint working is underway between all Norfolk local authorities through the Norfolk Strategic Planning Framework (NSPF) on a wide range of issues including housing, green infrastructure, health, climate change, the economy, and telecommunications. Consideration of the NSPF has been included in the review of the DM policies plan and site allocations plan.
12. PAS guidance states that if assessment of the above issues suggests that a different strategy or strategic policy approach is necessary then an update to the plan is likely to be necessary. The scope of the update will depend on the extent to which the vision and objectives and spatial strategy are still 'fit for purpose'.

Wider local plan review factors

13. There is some overlap between wider policy issues and how these are reflected in individual local plan policies. The extent to which the plan policies still reflect current national policy requirements is addressed in the section on the DM Policies plan in paragraphs 20-22 below and at Appendix 1.
14. Monitoring information has been used to assess whether plan policies are on target to deliver plan objectives such as employment / office floorspace targets. For example, the Annual Monitoring Report for 2017-18 notes a significant loss of employment floorspace over the year which seems to be closely related to permitted development rights allowing for changes of use from office to residential without the need for planning permission. However, the council is considering options for resisting the loss of office floorspace which is likely to involve commissioning specialist evidence and may result in imposition of an Article 4 Direction, to resist further loss of such floorspace and to support the promotion of offices in the city centre.

15. There have been some challenges to local economic conditions since adoption of both plans but no compelling evidence to date that this will undermine delivery of the plans. For example:
- a. A major local employer (Britvic / Unilever) is relocating from its long established site in the city centre, currently designated as an employment area in the Local Plan policies map. It is anticipated that the site will be allocated in the emerging Greater Norwich Local Plan (Regulation 18 plan) for residential-led mixed use development to be informed by a masterplan for the east Norwich sites, including the Deal Ground and Utilities sites, to guide its redevelopment and ensure comprehensive regeneration of this new gateway quarter.
 - b. The Employment Town Centres and Retail Study 2017 (ETCRS), which is part of the evidence base of the GNLP, identifies a positive picture for the potential future of office based employment in the city centre, despite significant losses to office floorspace since 2008. The ETCRS identifies the Norwich urban area's role as principal focus and driver of the Greater Norwich economy. It acknowledges that Norwich city centre's employment offer is changing and identifies an increasing 're-urbanisation' of business activity, driven by wider business trends and small business creation within the creative and media sector in particular, back to locations which offer a broader range of services to employees including the city centre.
 - c. The AMR (2017-18) found that 5000 new jobs were created in Greater Norwich in that year, meeting the JCS target, 2000 of which were in Norwich.
 - d. The 2018 Retail Monitor presented a fairly positive picture given the prevailing economic climate, with only a small increase in vacant available retail floorspace and a reduction in the percentage of vacant units. The 2019 Retail Monitor is in preparation and should be presented to next Sustainable Development Panel. It is likely to reflect wider challenges to the retail market from the continuing growth in online shopping and from Brexit uncertainty.
 - e. Recent challenging economic circumstances have affected the viability of some housing development, with particular impact on delivery of affordable housing. The JCS (and emerging GNLP) sets the target for affordable housing delivery however the city council has recently adopted a supplementary planning document for affordable housing (July 2019) which provides guidance on viability assessment and other measures to promote delivery of affordable housing in Norwich to meet identified needs.
16. Although delivery of some site allocations has been affected by wider economic circumstances, a number of key allocations have been developed, are currently being developed or are subject to planning consent, as shown at Appendix 2. Several local plan allocations have been developed for purpose built student accommodation (PBSA), including the former Mecca Bingo Site on All Saints Green which was allocated for

employment uses, and St Stephen's Towers which was allocated for comprehensive mixed use development. In response to the increase in applications for PBSA the council has produced a 'Purpose built student accommodation: Evidence and best practice advice note' to guide applicants and decision-makers with the purpose of encouraging good quality and appropriate student accommodation in the city. PBSA now can be counted as part of housing delivery. The NPPF identifies students as a group whose housing needs should be addressed. The higher education institutions also have an important role to play in delivering a creative city as part of the Norwich 2040 City Vision. Norwich's site allocations will be superseded by the GNLP as noted above.

17. There have been no significant changes to the local environmental or heritage context which have implications for the local plan approach or policies. For example there have been no recent changes to conservation areas, or changes to local nature conservation designations such as County Wildlife Sites or Sites of Special Scientific Interest, or to the city centre Air Quality Management Area. Also, a revised Greater Norwich Strategic Flood Risk Assessment (2017) has updated the flood zone boundaries, which means that the local plan policies map is out of date in this respect, however the updated boundaries are available on the council's website and are being used to inform planning decision-making.
18. The 2019 NPPF continues the previous NPPF's focus on mitigating and adapting to climate change. The need to respond effectively to climate change will be fundamental to any review of the local plan and will impact on many policy areas in the Development Management Policies plan as well as in the emerging GNLP and the NSPF. The 2019 NPPF requires that development should wherever possible help to improve local environmental conditions such as air quality, which is reflected in provisions within the Environment Bill. There may be a range of policy implications arising from the Environment Bill which should be considered when it passes into law, as is noted below and in the assessment of many local plan policies at Appendix 1.
19. Finally, the emerging Greater Norwich Local Plan (which will include site allocations as noted above) may have a material impact on the planning context for the DM Policies plan. Therefore any future review of the latter plan should be informed by the GNLP once there is some clarity about its policy content.

Review assessment – Development Management Policies Plan

20. The table at Appendix 1 assesses the plan's policies on an individual basis. Policies have been assessed using a 'traffic light' approach:

- Green Policy is still currently fit for DM purposes and no changes are required.
- Orange Policy is still currently fit for DM purposes but issues may have been identified, the policy may need minor alteration, or further evidence may be required. Further

review in due course is desirable.

- Red The policy is not fit for DM purposes and requires urgent review.

21. The review at Appendix 1 finds that 18 DM policies are still 'fit for purpose' in the sense that they meet the content requirements of the NPPF and are being successfully implemented, and are considered overall to reflect current national planning policy requirements. However a significant number of policies would benefit from minor updates or clarifications to make them easier to use (for example policy DM5 'Planning effectively for flood resilience' would benefit from additional guidance relating to sustainable drainage measures) and some require new evidence to make them effective (for example policy DM19 'Encouraging and promoting major office growth' may require gathering of new evidence to support an Article 4 Direction aimed at protecting against the loss of office space). The review finds that it would be desirable to review 15 DM policies, albeit that these policies are still considered 'fit for purpose' for decision making until such time that a review takes place. In addition there may be policy implications arising from emerging legislation such as the Environment Bill which are likely to impact on a number of policies which consider, for example air quality, biodiversity etc. as noted above. However, it will take some time for the full provisions of the Bill to be brought forward in legislation.

22. Although, based on the assessment at Appendix 1, there is considered to be no immediate case for an urgent full or partial review of the DM policies plan, there is a case for commencing a full review of the plan within the next couple of years given the issues noted above. It would make sense for the review to commence when there is some clarity about the content of the GNLP given that the higher tier plan will provide the strategic planning context for the lower tier plan. The draft Regulation 18 GNLP is due to be consulted upon in early 2020; following that the revised Regulation 19 draft will be consulted upon, prior to being submitted to the Secretary of State for public examination. A good opportunity to commence the review of the DM policies plan would be following the Regulation 19 consultation of the GNLP but before the start of the public examination. This stage is likely to be reached in Spring 2021.

Review assessment – Site Allocations and Site Specific Policies Plan

23. The Site Allocations plan will be superseded by the GNLP upon its adoption. The assessment of allocations in the current plan is set out at Appendix 2 and is based on whether sites are still available for development (a number have been developed already, as would be expected) and on whether there is any evidence to suggest that the sites cannot be delivered in the plan period. This is supplemented by information about planning consents and delivery on individual sites as relevant.

24. The table at Appendix 2 also assesses the site specific allocations using a 'traffic light' approach:

- Green There is no current evidence to suggest that the site is not deliverable within the plan period. No changes required.
- Orange As part of any future update of the Site Allocations Plan, the site would not be included as the allocation has either come forward in full or is assumed to come forward in full in accordance with granted permissions within the plan period.
- Red There is evidence that the site would not come forward in full within the plan period.

25. The review at Appendix 2 finds that 57 of the site specific policies in the Site Allocations plan are still relevant and require no change as there is no current evidence to suggest that these allocations cannot be delivered within the plan period. 15 of the site specific policies are no longer considered to be relevant as either the allocations have come forward in full or it is assumed that they will come forward full as a result of the granting of planning permission/commencement of works. One site specific policy CC27: St Stephens Street is no longer considered to be relevant. CC27 was allocated for a comprehensive mixed use development including primary retail development at ground floor and office and residential uses on upper floors. However, a significant part of the site has been brought forward as student accommodation leaving parcels of disjointed allocated land. As such it is considered that the allocation cannot come forward in full as originally intended and therefore policy CC27 is no longer considered relevant and should be given reduced weight.

26. However, notwithstanding the above, the site allocations plan is also being reviewed in detail as part of the GNLP which, once adopted, will supersede the Norwich City Council site allocations plan. Therefore, it will not be necessary for the Council to undertake a separate full review of this plan.

Conclusions and recommendation

27. In summary, there is no immediate case for commencing full or partial review of the DM Policies plan for the reasons set out in this report and at Appendix 1, however there is a case for commencing a full review of the plan following the Regulation 19 consultation of the GNLP but before the start of the public examination. This stage is likely to be reached in Spring 2021.

28. There is no need for the city council to review the Site allocations plan as this is currently being reviewed through the preparation of the GNLP.

29. It should be noted that this Regulation 10A review has outlined some areas for future policy review but is not an exhaustive list of changes. The local plan review (recommended in paragraph 27) will be based upon information available at the time of that review and may therefore make different conclusions to those of the Regulation 10A review.

Appendix 1: DM Policies Plan Review Table

Policy	Conformity with National Policy	Evidence and change to local circumstances	Recommendation
DM1 Achieving sustainable development	Policy DM1 is considered to be consistent with the provisions of the updated NPPF.	On the basis of the review of the other policies below, Policy DM1 is considered to still be relevant and central to the successful implementation of the other local plan policies.	DM1 is considered to be in line with national policy and there are no local circumstances that suggest the policy is not fit for purposes. No changes required to DM1.
DM2 Ensuring satisfactory living and working conditions	DM2 seeks to achieve the strategic aim of the NPPF to ensure that development provides for satisfactory living conditions for both existing and future occupiers. Therefore Policy DM2 is considered to be consistent with the provisions of the updated NPPF.	The Development Management team, who have been implementing this policy, consider it is still fit for purpose for decision making. Furthermore, the Council won 67% of appeals on decisions which were refused on the grounds of policy DM2 in the period September 2018-September 2019.	DM1 is considered to be in line with national policy and there are no local circumstances that suggest the policy is not fit for purposes. No changes required to DM2.
DM3 Delivering high quality design	New NPPF requirement to support opportunities for using airspace above existing buildings. DM3 does not currently refer to this but its content is considered sufficient to assess such applications. Policy DM3 could be updated to include specific reference to this. Publication of the National Design Guide 2019 and updated Planning Practice Guidance: DM3	The Council won 70% of appeal decisions which were refused on the grounds of policy DM3 in the period September 2018-September 2019 suggesting that the policy is fit for purpose for decision making. Some parts of DM3 are only applicable to major development types. The policy could be restructured to allow for more effective	Policy DM3 is considered to be fit for purpose at the present time however a future review is considered desirable.

Appendix 1: DM Policies Plan Review Table

Policy	Conformity with National Policy	Evidence and change to local circumstances	Recommendation
	does not currently make reference to the use of the Guide and does not have a local design guide. There is the opportunity to produce a local design guide in future.	implementation. Various standards and guides are referred to within the policy which are no longer applicable or have been updated. DM3 could be updated to refer to the most up to date standards.	
DM4 Providing for renewable and low carbon energy	Policy DM4 seeks to achieve the aims of the NPPF to encourage renewable energy schemes and is therefore considered to be consistent with the provisions of the updated NPPF.	According to the latest AMR 2017-2018, no specific renewable energy/low carbon schemes were submitted to the City Council during that monitoring period. This policy is infrequently used, however the Development Management team (who are implementing this policy) considered it is still fit for purpose.	DM4 is considered to be in line with national policy and there are no local circumstances that suggest the policy is not fit for purposes. No changes required to DM4.
DM5 Planning effectively for flood resilience	New NPPF strengthens wording on locating development away from areas at risk of flooding and requires sustainable drainage measures for major development. DM5 is considered to be consistent with the provisions of the updated NPPF.	According to the latest AMR 2017-2018, there were no approvals of planning permission contrary to EA advice in relation to flooding. Observations by the Development Management team outline that the policy could provide more detailed advice on the type of assessment and measures required for different development types to provide clarity to developers. This could be included within the policy or as an SPD/guidance note.	Policy DM5 is considered to be fit for purpose at the present time however a future review is considered desirable.
DM6 Protecting and enhancing the natural environment	The publication of the Environment Bill in October 2019 includes mandating biodiversity net gain and the requirement to produce nature recovery strategies identifying where compensatory provision of biodiversity can be	As part of the latest informal review of the DMP 2017-2018, there was no reported loss of SSSI, CWS and CGS sites. The Development Management team, who have	DM6 is considered to be fit for purpose at the present time however a future

Appendix 1: DM Policies Plan Review Table

Policy	Conformity with National Policy	Evidence and change to local circumstances	Recommendation
	delivered. It is not considered necessary to update DM6 in accordance with these proposals given that they are yet to be fully considered by Parliament and have not yet passed into law. However, DM6 will need to be kept under review when this situation changes.	been implementing this policy, consider that it is still fit for purpose for decision making.	review is considered desirable.
DM7 Trees and Development	The publication of the Environment Bill in October 2019 includes mandating biodiversity net gain and the requirement to produce nature recovery strategies identifying where compensatory provision of biodiversity can be delivered. It is not considered necessary to update DM7 in accordance with these proposals given that they are yet to be fully considered by Parliament and have not yet passed into law. However, DM7 will need to be kept under review when this situation changes.	<p>It has been observed that DM7 does not currently specify a method for calculating replacement biomass. Further clarity is required, however this could be provided in the form of an SPD/guidance note or review of the existing Landscape and Trees SPD.</p> <p>Policy DM7 refers to provision of new street trees. Highways responsibilities will transfer to the County Council at the end of the financial year as a result of the Highways Agency Agreement coming to an end. Policy DM7 may require a review to ensure the provision of street trees can be achieved in context of the administrative/management arrangements.</p>	DM7 is considered to be fit for purpose at the present time however a future review is considered desirable.
DM8 Planning effectively for open space and recreation	The publication of the Environment Bill in October 2019 includes mandating biodiversity net gain and the requirement to produce nature recovery strategies identifying where compensatory provision of biodiversity can be delivered. It is not considered necessary to update DM8 in accordance with these proposals given that they are yet to be fully considered by Parliament and have not yet passed into law. However, DM8 will need to be kept under review when this situation changes.	<p>As part of recent monitoring of DM policies in 2017-2018, it was reported that 5550m2 of open space was lost as a result of school expansions. However, the loss of this space was considered acceptable given that it was for necessary school expansion and included alternative recreational uses.</p> <p>Policy DM8 was produced on the basis of an Open Space Needs Assessment (OSNA) conducted in 2007. It is likely that the situation on the ground has change. A revised OSNA is currently underway and should be used to inform</p>	DM8 is considered to be fit for purpose at the present time however a future review is considered desirable.

Appendix 1: DM Policies Plan Review Table

Policy	Conformity with National Policy	Evidence and change to local circumstances	Recommendation
DM9 Safeguarding Norwich's heritage	<p>Publication of the National Design Guide 2019 and updated Planning Practice Guidance. DM3 does not currently make reference to the use of the Guide and does not have a local design guide. There is the opportunity to produce a local design guide in future. The Council currently makes use of Conservation Area Appraisals in assessing applications.</p> <p>PPG has been updated requiring lists of non-designated heritage assets to be produced. DM9 refers to non-designated assets for consideration in planning applications. A non-designated heritage asset list may need to be drawn up in future, however this does not require alteration to DM9.</p> <p>Plans announced to require all authorities to produce a locally designated heritage asset list. Norwich City Council currently makes use of a local list produced by The Norwich Society.</p>	<p>any policy changes.</p> <p>As part of recent monitoring of DM policies in 2017-2018, no listed buildings were reported as demolished within the monitoring. 31 assets were included on the Heritage at Risk Register which represented a very slight increase from the year before.</p> <p>The Development Management team (who are implementing this policy) still consider this policy is fit for purpose for decision making. In addition, the Council won (or won in part) 60% of appeal decisions which were refused on the grounds of policy DM9 in the period September 2018-September 2019.</p>	<p>The policy is considered to be in line with national policy and there are no local circumstances or evidence that suggests the policy is not fit for DM purposes.</p> <p>No changes required to DM9.</p>
DM10 Supporting the delivery of communications infrastructure	<p>The policy seeks to encourage the sharing of facilities. Policy DM10 is considered to be consistent with the provisions of the updated NPPF.</p> <p>At the time of undertaking this review, MHCLG were undertaking a consultation on 'Proposed reforms to permitted development rights to support the deployment of 5G and extend mobile coverage'. Policy DM10 will need to be kept under review to reflect any anticipated</p>	<p>As part of recent monitoring of DM policies in 2017-2018, there was a reported decrease in the number of telecoms permissions allowed in conservation areas (or other protected areas) within the monitoring period.</p> <p>Policy DM10 is in line with the aims of the NSPF which has been undertaking work to aid improvements to existing network coverage and enable the roll out of 5G across Norfolk.</p>	<p>DM10 is considered to be fit for purpose at the present time however a future review is considered desirable.</p>

Appendix 1: DM Policies Plan Review Table

Policy	Conformity with National Policy	Evidence and change to local circumstances	Recommendation
	changes in national policy and guidance, for example as a result of any changes to permitted development rights (as above) or any new legislation relating to telecommunications.		
DM11 Protecting against environmental hazards	The publication of the Environment Bill in October 2019 and includes changes in relation to air and water quality etc. It is not considered necessary to update DM11 in accordance with these proposals given that they are yet to be fully considered by Parliament and have not yet passed into law. However, DM11 will need to be kept under review when this situation changes.	<p>As part of recent monitoring of DM policies in 2017-2018, there was a reported reduction in NO2 emissions and either no change or slight increase in particulates (location dependent). This will continue to be monitored for the period 2018-2019.</p> <p>In the latest AMR of the JCS for the monitoring year 2017-2018, both Domestic, and Industry and Commerce CO2 emissions were reduced compared to the previous monitoring period. Emissions from Transport, however, saw a slight increase. This will continue to be monitored for the period 2018-2019.</p> <p>DM11 may require an update in relation to Health and Safety Executive Areas as a result of granted permissions.</p> <p>The Development Management team (who have been implementing this policy) considered it is still fit for purpose for decision making.</p>	DM11 is considered to be fit for purpose at the present time however a future review is considered desirable.
DM12 Ensuring well-planned housing development	The new NPPF includes significant information in relation to housing need and delivery. These matters are being considered in the preparation of the GNLP. Other changes relate to the need to consider housing in town centres. DM12 (along with DM20 and DM21)	In the latest AMR of the JCS for the monitoring year 2017-2018, it was reported that there was a decrease in housing delivery to 237 units from 445 units in the previous year. The housing delivery data from 2018 -2019 collected at the time of the above report showed that units	The policy is considered to be in line with national policy and there are no local circumstances or

Appendix 1: DM Policies Plan Review Table

Policy	Conformity with National Policy	Evidence and change to local circumstances	Recommendation
	<p>already made provision for this. Therefore, policy DM12 is considered to be consistent with the provisions of the updated NPPF.</p> <p>The current consultation on updating Building Regulations referring to energy efficiency of homes may need to be reflected within DM12, however it is not clear whether these changes will formally be brought forward.</p>	<p>delivered had significantly increased to 1084 units suggesting that policies continue to contribute to housing delivery.</p> <p>The Development Management team (who are implementing this policy) consider that it is still fit for purpose for decision making.</p> <p>DM12 refers to a number of standards (such as Lifetime Homes standard) which are no longer relevant or have been superseded. As part of any future review DM12 could be updated to refer to any new standards.</p>	<p>evidence that suggests the policy is not fit for DM purposes.</p> <p>No changes required to DM12.</p>
DM13 Communal development and multiple occupation	Policy DM13 is considered to be consistent with the provisions of the updated NPPF.	<p>The Council have recently taken a stronger stance in relation to large HMOs and have won 100% of appeals against applications for large HMOs in the period September 2018-October 2019. This suggests that policy DM13 is still fit for purpose for decision making.</p> <p>There has been a significant increase in Purpose Built Student Accommodation (PBSA) recently. The Council has produced a PBSA guidance note to support decision making alongside DM13.</p> <p>The Development Management team (who have been implementing this policy) consider it is still fit for purpose for decision making.</p>	<p>The policy is considered to be in line with national policy and there are no local circumstances or evidence that suggests the policy is not fit for DM purposes.</p> <p>No changes required to DM13.</p>
DM14 Meeting the needs of Gypsies, travellers and travelling showpeople	The updated version of the NPPF does not include any changes in relation to accommodation needs for Gypsy, traveller and showpeople. Therefore DM14 is considered to be consistent with the provisions of the updated NPPF.	The emerging Greater Norwich Local Plan will include a criteria based policy relating to development of gypsy and traveller sites, travelling showpeople sites and residential caravans, which will supersede DM14. The GNLP policy will be based on updated evidence:	The policy is considered to be in line with national policy and there are no local circumstances or

Appendix 1: DM Policies Plan Review Table

Policy	Conformity with National Policy	Evidence and change to local circumstances	Recommendation
		the Norfolk Caravans and Houseboats Needs Assessment (RRR Consultancy, 2017). Policy DM14 refers to the need for additional pitches in Norwich to be provided by end of March 2016. There is current planning consent for 13 units - development is expected to commence by the end of this year.	evidence that suggests the policy is not fit for DM purposes. No changes required to DM14.
DM15 Safeguarding the City's housing stock	The updated NPPF continues to place great emphasis on the ability of local authorities to meet the housing need for their area. Policy DM15 is considered to be consistent with the provisions of the updated NPPF to ensure that housing is not lost from the City unnecessarily. Therefore DM15 is considered to be consistent with the provisions of the updated NPPF.	As part of recent monitoring of DM policies in 2017-2018, the loss of two residential properties to other uses were reported. However, in one case this loss was to provide a Class C2 residential institution and in the other case the loss was the combining of two flats to create one dwelling. Therefore, the changes have occurred to uses which still provide some form of residential accommodation. Similarly, the 2017-2018 informal review of the DMP reported the construction of student accommodation on land partly allocated for housing (Site Allocation Policy CC27). However, this proposal has also brought forward some form of residential accommodation. The Development Management team (who have been implementing this policy) consider it is still fit for purpose for decision making.	The policy is considered to be in line with national policy and there are no local circumstances or evidence that suggests the policy is not fit for purpose. No changes required to DM15
DM16 Supporting the needs of business	The new NPPF and updated PPG include additional reference to understanding business needs and national economic trends, and recognising different locational requirements of different sectors.	As part of recent monitoring of DM policies in 2017-2018, it was identified has been a net loss of employment uses across the city, although this loss is reported as greater outside of defined employment areas. In discussion with the Development Management team (who have been	DM16 is considered to be fit for purpose at the present time however a future review is

Appendix 1: DM Policies Plan Review Table

Policy	Conformity with National Policy	Evidence and change to local circumstances	Recommendation
	<p>The strategic vision for growth and the economic development for the Greater Norwich area are covered by the JCS, which is being reviewed as part of the preparation of the GNLP.</p> <p>Therefore DM16 is considered to be consistent with the provisions of the updated NPPF.</p>	<p>implementing this policy), it is considered that some of this loss is likely due to a proliferation of main town centre uses being permitted in employment areas. The Development Management team consider this policy is still currently fit for purpose for decision making, however it is suggested that further evidence may be required to investigate observed trends further.</p>	<p>considered desirable.</p>
<p>DM17 Supporting small business</p>	<p>The new NPPF and updated PPG include additional reference to understanding business needs and national economic trends, and recognising different locational requirements of different sectors.</p> <p>The policy includes reference to allowing other uses in employment areas where it can be demonstrated that there is no viable prospect of it continuing to be used for business purposes and therefore DM17 is considered to be consistent with the provisions of the updated NPPF.</p>	<p>As part of recent monitoring of DM policies in 2017-2018, it was reported that there was an increase in office space less than 1500m2 and an increase in new small/medium business space in the city. These trends suggest that the policy is successfully promoting new small business spaces and is still fit for purpose for decision making.</p> <p>The Development Management team (who have been implementing this policy) have observed a proliferation of main town centre uses being permitted in employment areas. Therefore, it is suggested that further evidence may be required to investigate observed trends further.</p>	<p>DM17 is considered to be fit for purpose at the present time however a future review is considered desirable.</p>
<p>DM18 Promoting and supporting centres</p>	<p>The new NPPF increases the emphasis on encouraging housing within centres. DM18 does not specifically refer to this, however this is covered in the application of policy DM12, DM20 and DM21.</p> <p>Therefore policy DM18 is considered to be consistent with the provisions of the updated NPPF.</p>	<p>The results of the latest retail monitor report for 2018 outlined that whilst there were changes in the vacancy rates etc. within the city centre, Norwich is still considered to be a thriving destination centre that has a diverse offering.</p> <p>As part of recent monitoring of DM policies in 2017-2018, it was reported that a greater proportion of main town centre uses were permitted outside of defined centres compared to</p>	<p>DM18 is considered to be fit for purpose at the present time however a future review is considered desirable.</p>

Appendix 1: DM Policies Plan Review Table

Policy	Conformity with National Policy	Evidence and change to local circumstances	Recommendation
		<p>within these designated areas. However, this data does not specify what proportion of the development permitted outside of the defined centres was located in edge of centre locations.</p> <p>The Development Management team (who have been implementing this policy) have observed a proliferation of main town centre uses being permitted in employment areas. Therefore, it is suggested that further evidence may be required to investigate observed trends further.</p> <p>The Development Management team have also identified areas of the policy which would benefit from greater clarity on wording.</p>	
DM19 Encouraging and promoting major office growth	The new NPPF removes reference to the need for an impact assessment for office development outside of defined centres. DM19 will require an update to reflect this. The provisions of the updated NPPF are considered sufficient for decision making purposes until DM19 can be updated as above.	<p>As part of the latest AMR of the JCS 2017-2018, a net loss of office space of 40,205m2 was reported for Norwich. In the period 2008-2018, there has been overall net reduction in office space of approx. 25.8%. Much of the lost office space is as a result of the ability to change B1 office into residential units under the prior approval process. The Council are considering the use of an Article 4 Direction in order to protect against the inappropriate loss of floorspace, which would not require alteration to policy DM19</p> <p>A Greater Norwich Employment Town centre & Retail Study: Strategy Advice 2017 was recently prepared as part of the evidence base for the GNLP. This provides updated evidence to that considered in the preparation of the DMP. Therefore DM19 may need to be reviewed in light</p>	DM19 is considered to be fit for purpose at the present time however a future review is considered desirable.

Appendix 1: DM Policies Plan Review Table

Policy	Conformity with National Policy	Evidence and change to local circumstances	Recommendation
		<p>of this evidence.</p> <p>The Office Priority Area needs review as it currently contains sites which have been brought forward for alternative uses than those envisaged in the Site Allocations plan.</p>	
DM20 Promoting and supporting city centre shopping	<p>The new NPPF includes emphasis on the need for local authorities to respond to rapid changes in retail and leisure. DM20 should be read in conjunction with the associated Main Town Centre Uses and Retail Frontages SPD. This SPD provides guidance on thresholds for uses in these centres and encouraging beneficial supporting services. Therefore policy DM20 is considered to be consistent with the provisions of the updated NPPF.</p>	<p>As part of recent monitoring of DM policies in 2017-2018, it was reported that none of the identified retail frontages/areas referred to in policy DM20 were operating with the proportion of retail frontage below the threshold outlined in the SPD. This indicates that the policy has been implemented successfully.</p> <p>The Greater Norwich Employment Town centre & Retail Study: Strategy Advice 2017 was prepared as part of the evidence base for the GNLP. Policy DM20 is considered to be consistent with this evidence.</p> <p>The Development Management team (who have been implementing this policy, consider it is still fit for purpose for decision making.</p>	<p>The policy is considered to be in line with national policy and there are no local circumstances or evidence that suggests the policy is not fit for DM purposes.</p> <p>No changes required to DM20.</p>
DM21 Protecting and supporting district and local shopping centres	<p>The new NPPF includes emphasis on the need for local authorities to respond to rapid changes in retail and leisure. Policy DM21 is considered to be consistent with the provisions of the updated NPPF.</p>	<p>The latest retail monitor report 2018 outlined that whilst there were changes in the vacancy rates and percentages of retail occupation, overall, the district and local centres continue to be perform their function and to offer an appropriate range of local services and facilities. This would suggest that the current policy is being implemented effectively.</p> <p>The Greater Norwich Employment Town centre & Retail Study: Strategy Advice 2017 was prepared</p>	<p>The policy is considered to be in line with national policy and there are no local circumstances or evidence that suggests the policy is not fit for DM purposes.</p>

Appendix 1: DM Policies Plan Review Table

Policy	Conformity with National Policy	Evidence and change to local circumstances	Recommendation
		<p>as part of the evidence base for the GNLP. Policy DM21 is considered to be consistent with this evidence.</p> <p>The Development Management team (who have been implementing this policy, consider it is still fit for purpose for decision making.</p>	No changes required to DM21.
DM22 Planning for and safeguarding community facilities	Policy DM22 is considered to be consistent with the provisions of the updated NPPF.	<p>As part of recent monitoring of DM policies in 2017-2018, an increase in the amount of community facility and educational/training floorspace was reported compared with the previous years.</p> <p>Two protected community public houses (outlined in Appendix 5 of the DMP) were lost to other uses. As part of any future review, the list of protected pubs in Appendix 5 should be updated to accurately reflect changes on the ground.</p> <p>The Development Management team (who have been implementing this policy, consider it is still fit for purpose for decision making.</p>	<p>The policy is considered to be in line with national policy and there are no local circumstances or evidence that suggests the policy is not fit for DM purposes.</p> <p>No changes required to DM22.</p>
DM23 Supporting and managing the evening economy	The new NPPF includes reference to the 'agent of change' principle. Although there is no specific reference to this within DM23, the provisions of the updated NPPF are considered sufficient for decision making purposes in this respect and therefore no alteration to DM23 is required.	It has been observed that the boundary of the Late Night Activity Zone may need reviewing to reflect changes on the ground. The Development Management team (who are implementing this policy) consider policy DM24 is still fit for purpose for decision making at the current time. However, it is recommended that further evidence is required in relation to the above who may inform future policy changes.	DM23 is considered to be fit for purpose at the present time however a future review is considered desirable.

Appendix 1: DM Policies Plan Review Table

Policy	Conformity with National Policy	Evidence and change to local circumstances	Recommendation
DM24 Managing the impacts of hot food takeaways	This policy is intended to be read in conjunction with other policies in the plan (E.g. DM2, DM20, DM21 etc.) DM24 (and related policies) is considered to be consistent with the provisions of the updated NPPF.	<p>The 2016/2017 AMR report outlined that more A5 hot food takeaway uses have been permitted within centres than outside of centres, suggesting that the location of these services is being directed to the most appropriate locations.</p> <p>In addition, the Development Management team (who have been implementing this policy) consider that the policy is still fit for purpose for decision making.</p>	<p>The policy is considered to be in line with national policy and there are no local circumstances or evidence that suggests the policy is not fit for purpose.</p> <p>No changes required to DM24.</p>
DM25 Retail warehousing	DM25 is considered to be consistent with the provisions of the updated NPPF.	<p>As part of recent monitoring of DM policies in 2017-2018, there were no reported approvals or refusals of permission to relax restrictions relating to retail warehousing.</p> <p>The Development Management team (who have been implementing this policy) considered it still fit for purpose for decision making.</p>	<p>The policy is considered to be in line with national policy and there are no local circumstances or evidence that suggests the policy is not fit for purpose.</p> <p>No changes required to DM25.</p>
DM26 Supporting development at the University of East	DM26 is considered to be consistent with the provisions of the updated NPPF.	<p>The University has produced the following documents since the adoption of the plan:</p> <ul style="list-style-type: none"> • Travel Plan Strategy 	<p>The policy is considered to be in line with national policy and</p>

Appendix 1: DM Policies Plan Review Table

Policy	Conformity with National Policy	Evidence and change to local circumstances	Recommendation
Anglia (UEA)		<ul style="list-style-type: none"> Draft Development Framework Strategy <p>The Development Management team (who have been implementing this policy) consider it still fit for purpose for decision making.</p>	<p>there are no local circumstances or evidence that suggests the policy is not fit for purpose.</p> <p>No changes required to DM26.</p>
DM27 Development at Norwich Airport	<p>The new NPPF emphasises the importance of general aviation airfields and provision/support of large scale infrastructure:</p> <ul style="list-style-type: none"> Para 104 e): authorities should provide for any large scale transport facilities which need to be located in their area, including supporting their operation, expansion and contribution to the wider economy. Para 104 f) importance of maintaining a national network of general aviation airfield and their need to adapt and change over time. <p>DM27 is considered to be consistent with the provisions of the updated NPPF.</p>	<p>The latest version of the Airport Masterplan was endorsed by the City Council in October 2019 and will provide guidance for development in accordance with policy DM27.</p> <p>The Development Management team (who are implementing this policy) considered that the policy is still fit for purpose for decision making, however, it is acknowledged that as part of any future review the text of DM27 will need to be updated to refer to the new Masterplan and the airport operational boundary will need to be adjusted as necessary.</p>	<p>The policy is considered to be in line with national policy and there are no local circumstances or evidence that suggests the policy is not fit for DM purposes.</p> <p>No changes required to DM27.</p>
DM28 Encouraging sustainable travel	<p>The new NPPF includes reference to the need to consider strategic transport issues and ensuring allocated sites promote sustainable transport modes. Both of these strategic matters will be covered by the GNLP.</p> <p>DM28 is considered to be consistent with the</p>	<p>This policy is considered to be in line with the aims of the NSPF to ensure appropriate transportation is available for residents, although it is acknowledged that the NSPF also focuses on the strategic transport network which is covered by the GNLP.</p>	<p>The policy is considered to be in line with national policy and there are no local circumstances or evidence that</p>

Appendix 1: DM Policies Plan Review Table

Policy	Conformity with National Policy	Evidence and change to local circumstances	Recommendation
	provisions of the updated NPPF.	The Transportation team and Development Management team (who are implementing this policy) consider that the policy is still relevant and fit for purpose for decision making.	suggests the policy is not fit for DM purposes. No changes required to DM28.
DM29 Managing car parking demand in the city centre	The new NPPF requires that clear and compelling justification must be given for maximum parking standards. Parking standards (included in Appendix 3 of the DMP) were included in the DMP to support sustainable transport, taking account of the urban city environment and road congestion. DM29 is considered to be consistent with the provisions of the updated NPPF.	The Transportation team have confirmed that the current number of off-street parking spaces available is approx. 9,965, below the threshold of 10,000 set out within the policy. The Development Management team (who are implementing this policy) have observed that the policy makes no provision for restricting/assessing proposals for new car parks that are located just outside of the city centre parking area. This should be considered as part of any future review. As part of Transforming Cities, the Council are considering mobility hubs around the city to encourage and enable sustainable travel. DM29 may require future review to accord with any transport strategies. The Development Management team (who are implementing this policy) consider that DM29 is fit for purpose for decision making.	DM29 is considered to be fit for purpose at the present time however a future review is considered desirable.
DM30 Access and highway safety	DM30 is considered to be consistent with the provisions of the updated NPPF.	Developments continue to be designed to achieve 20mph traffic zones. This is supported by wider transport strategies including speed limits as part Transforming Cities projects.	The policy is considered to be in line with national policy and there are no local

Appendix 1: DM Policies Plan Review Table

Policy	Conformity with National Policy	Evidence and change to local circumstances	Recommendation
		The Development Management team (who are implementing this policy) consider it is still fit for purpose for decision making.	circumstances or evidence that suggests the policy is not fit for DM purposes. No changes required to DM30.
DM31 Car parking and servicing	<p>The new NPPF requires that clear and compelling justification must be given for maximum parking standards. Parking standards (included in Appendix 3 of the DMP) were included in the DMP to support sustainable transport, taking account of the urban city environment and road congestion.</p> <p>The new NPPF also emphasises the need to ensure adequate provision for plug-in and other ultra- low emissions vehicles.</p>	<p>The City Council have won 100% of appeals based on decisions made in relation to policy DM31 in the period September 2018 - September 2019 suggesting the policy is still fit for purpose for decision making.</p> <p>As part of Transforming Cities, the Council are considering mobility hubs around the city to encourage and enable sustainable travel. DM31 may require future review to accord with any transport strategies.</p> <p>The Transportation team and Development Management team highlighted that the parking standard standards relating to EV charging points require revision to encourage the use of low and ultra-low emissions vehicles and to ensure appropriate infrastructure is in place for future anticipated increase in these modes of transport. Therefore, further work will be required to understand future demand for this infrastructure to inform any policy changes.</p>	DM31 is considered to be fit for purpose at the present time however a future review is considered desirable.

Appendix 1: DM Policies Plan Review Table

Policy	Conformity with National Policy	Evidence and change to local circumstances	Recommendation
DM32 Encouraging car free and low car housing	DM32 is considered to be consistent with the provisions of the updated NPPF.	<p>The Transportation team and Development Management team (who have been implementing this policy) consider that it is still fit for purpose for decision making. There continues to be approval of applications that are car free or low car housing schemes in appropriate locations.</p> <p>As part of Transforming Cities, the Council are considering mobility hubs around the city to encourage and enable sustainable travel. DM32 may require future review to accord with any transport strategies.</p> <p>Appendix 3 which relates to parking standards may benefit from review.</p>	<p>The policy is considered to be in line with national policy and there are no local circumstances or evidence that suggests the policy is not fit for DM purposes.</p> <p>No changes required to DM32.</p>
DM33 Planning obligations and development viability	The general principles of the policy are in accordance with the new NPPF.	<p>Although the policy is still considered fit for purpose for planning decision-making purposes overall, the S123 list which it refers to is now no longer a requirement (the CIL regulations have replaced this with a requirement for an Infrastructure funding statement), and the Planning Obligations Prioritisation Framework is no longer relevant. Planning practice guidance has been updated recently in relation to viability so the policy would benefit from review in due course to reflect this and the changes referred to above.</p>	<p>DM33 is considered to be fit for purpose at the present time however a future review is considered desirable.</p>

Appendix 2: Site Allocations Plan Review Table

Allocation	Evidence and change to local circumstance	Recommendation
City Centre Sites		
CC1: 60-70 Ber Street	The site has consent for the change of use from use class B8 to A1. However, the site has been assessed by the Council and there is no current evidence to suggest that the site is not deliverable within the plan period.	No change required to CC1
CC2: 147-153 Ber Street	This site has been assessed by the Council and there is no current evidence to suggest that the site is not deliverable within the plan period.	No change required to CC2
CC3: 10-14 Ber Street	The site is owned by the Council. This site has been assessed by the Council and there is no current evidence to suggest that the site is not deliverable within the plan period.	No change required to CC3
CC4: Land at Rose Lane and Mountergate	Part of the site has consent and the car park development is complete. There is no current evidence to suggest that the remainder of the site is not deliverable within the plan period.	No change required to CC4
CC5: Land at Greyfriars Road/Rose Lane	The site has been developed and was considered complete as of July 2018. Therefore the site allocation has come forward in full.	As part of any future update of the Site Allocations Plan, CC5 would not be included as the allocation has come forward in full
CC6: St Anne's Wharf and adjoining land	The site has consent and is currently under construction. A further application is currently under consideration. Therefore the site allocation has not come forward in full but there is no current evidence to suggest that the remainder of the site is not deliverable within the plan period.	As part of any future update of the Site Allocations Plan, CC6 would not be included as the allocation will have been brought forward in full, assuming the site is built out in accordance with the granted permissions.
CC7: Land at Hobrugh Lane King Street	This site has been assessed by the Council and there is no current evidence to suggest that the site is not deliverable within the plan period.	No change required to CC7

Appendix 2: Site Allocations Plan Review Table

Allocation	Evidence and change to local circumstance	Recommendation
CC8: King Street Stores	This site has been assessed by the Council and there is no current evidence to suggest that the site is not deliverable within the plan period.	No change required to CC8
CC9: 144-162 King Street	The site has been developed and was considered complete as of April 2018. Therefore the site allocation has come forward in full.	As part of any future update of the Site Allocations Plan, CC9 would not be included as the allocation has come forward in full
CC10: Lane at Garden Street	This site has been assessed by the Council and there is no current evidence to suggest that the site is not deliverable within the plan period.	No change required to CC10
CC11: Lane at Argyle Street	This site has been assessed by the Council and there is no current evidence to suggest that the site is not deliverable within the plan period.	No change required to CC11
CC12: Land at Wherry Road	This site has been developed and was considered complete before April 2011. Therefore the site allocation has come forward in full.	As part of any future update of the Site Allocations Plan, CC12 should not be included as the allocation has come forward in full.
CC13: Land at Lower Clarence Road	This site has been assessed by the Council and there is no current evidence to suggest that the site is not deliverable within the plan period.	No change required to CC13
CC14: Busseys Garage site Thorpe Road	This site has been assessed by the Council and there is no current evidence to suggest that the site is not deliverable within the plan period.	No change required to CC14
CC15: Norwich Mail Centre 13-17 Thorpe Road	This site has been assessed by the Council and there is no current evidence to suggest that the site is not deliverable within the plan period.	No change required to CC15
CC16: Land adjoining Norwich City Football Club	This site has been assessed by the Council and there is no current evidence to suggest that the site is not deliverable within the plan period.	No change required to CC16

Appendix 2: Site Allocations Plan Review Table

Allocation	Evidence and change to local circumstance	Recommendation
CC17a: Barrack Street	This site has been assessed by the Council and there is no current evidence to suggest that the site is not deliverable within the plan period.	No change required to CC17a
CC17b: Whitefriars	This site has been assessed by the Council and there is no current evidence to suggest that the site is not deliverable within the plan period.	No change required to CC17b
CC18: 140-154 Oak Street	This site has been assessed by the Council and there is no current evidence to suggest that the site is not deliverable within the plan period.	No change required to CC18
CC19: Furniture Store, 70-72 Sussex Street	This site has been assessed by the Council and there is no current evidence to suggest that the site is not deliverable within the plan period.	No change required to CC29
CC20: Oak Street and Sussex Street commercial site 160-162 Oak Street	This site has been assessed by the Council and there is no current evidence to suggest that the site is not deliverable within the plan period.	No change required to CC20
CC21: Duke's Wharf, Duke Street (Former EEB Offices)	This site has been assessed by the Council and there is no current evidence to suggest that the site is not deliverable within the plan period.	No change required to CC21
CC22: Barn Road Car Park	This site has consent and is currently under construction. There is no current evidence to suggest that this will not be completed in full.	As part of any future update of the Site Allocations Plan, CC22 should not be included as the allocation has come forward, assuming current construction is completed in full.
CC23: Pottergate Car Park	This site has been assessed by the Council and there is no current evidence to suggest that the site is not deliverable within the plan period.	No change required to CC23
CC24: Land to Rear of City Hall	This site has been assessed by the Council and there is no current evidence to suggest that the site is not deliverable within the plan period.	No change required to CC24

Appendix 2: Site Allocations Plan Review Table

Allocation	Evidence and change to local circumstance	Recommendation
CC25: Chantry Car Park	This site has been assessed by the Council and there is no current evidence to suggest that the site is not deliverable within the plan period.	No change required to CC25
CC26: Former Mecca Bingo Site All Saints Green	This site has been developed and is considered complete. Therefore the site allocation has come forward in full.	As part of any future update of the Site Allocations Plan, CC26 should not be included as the allocation has come forward in full.
CC27: St Stephens Street	Part of this site has been developed for student accommodation and is considered complete. This has left parcels of disjointed allocated land. As such the allocation cannot come forward in full.	As part of any future review of the Site Allocations Plan, CC27 should not be included as there is evidence that the site would not be brought forward within the plan period. For the purpose of applying the current policy, reduced weight should be given to CC27.
CC28: Land and Buildings at the junction of St Stephens Street and Westlegate	This site has been assessed by the Council and there is no current evidence to suggest that the site is not deliverable within the plan period.	No change required to CC28
CC29: Land at Queens Road and Surrey Street	The majority of this site has consent however construction has not commenced. There is no current evidence to suggest that this site is not deliverable within the plan period.	As part of any future update of the Site Allocations Plan, CC29 should not be included as the allocation has come forward, assuming the extant permission is completed in full.
CC30: Westwick Street Car Park	This site has been assessed by the Council and there is no current evidence to suggest that the site is not deliverable	No change required to CC30

Appendix 2: Site Allocations Plan Review Table

Allocation	Evidence and change to local circumstance	Recommendation
	within the plan period.	
Rest of City Sites		
R1: The Neatmarket, Hall Road	This site has been assessed by the Council and there is no current evidence to suggest that the site is not deliverable within the plan period.	No change required to R1
R2: Norfolk Learning Difficulties Centre, Ipswich Road	This site has been assessed by the Council and there is no current evidence to suggest that the site is not deliverable within the plan period.	No change required to R2
R3: Hall Road District Centre	This site has been developed and is considered complete. Therefore the site allocation has come forward in full.	As part of any future update of the Site Allocations Plan, R3 should not be included as the allocation has come forward in full.
R4: Hewett Yard, Hall Road	This site has been assessed by the Council and there is no current evidence to suggest that the site is not deliverable within the plan period.	No change required to R4
R5: Part of school playing field of Hewett School	This site has been developed and is considered complete. Therefore the site allocation has come forward in full.	As part of any future update of the Site Allocations Plan, R5 should not be included as the allocation has come forward in full.
R6: 138a Hall Road and land to the rear	This site has been developed and is considered complete. Therefore the allocation has come forward in full.	As part of any future update of the Site Allocations Plan, R6 should not be included as the allocation has come forward in full.
R7: John Youngs Ltd. 24 City Road	This site has been assessed by the Council and there is no current evidence to suggest that the site is not deliverable within the plan period.	No change required to R7
R8: Aviva Car Park, Southwell Road/Brazen Gate	This site has been developed and is considered complete. Therefore the site allocation has come forward in full.	As part of any future update of the Site Allocations Plan, R8

Appendix 2: Site Allocations Plan Review Table

Allocation	Evidence and change to local circumstance	Recommendation
		should not be included as the allocation has come forward in full.
R9: The Deal Ground Trowse	This site has been assessed by the Council and there is no current evidence to suggest that the site is not deliverable within the plan period.	No change required to R9
R10: Utilities Site, Cremorne Lane	This site has been assessed by the Council and there is no current evidence to suggest that the site is not deliverable within the plan period.	No change required to R10
R11: Kerrison road, Hardy Road, Gothic Work	This site has been assessed by the Council and there is no current evidence to suggest that the site is not deliverable within the plan period.	No change required to R11
R12: 261-277 Aylsham Road	This site has been assessed by the Council and there is no current evidence to suggest that the site is not deliverable within the plan period.	No change required to R12
R13: Gas Holder at Gas Hill	This site has been assessed by the Council and there is no current evidence to suggest that the site is not deliverable within the plan period.	No change required to R13
R14: Land East of Bishop Bridge Road	This site has been assessed by the Council and there is no current evidence to suggest that the site is not deliverable within the plan period.	No change required to R14
R15: Land at Ketts Hill and Bishop Bridge Road	This site has been assessed by the Council and there is no current evidence to suggest that the site is not deliverable within the plan period.	No change required to R15
R16: 126-128 Barrack Street	This site has been assessed by the Council and there is no current evidence to suggest that the site is not deliverable within the plan period.	No change required to R16
R17: Van Dal Shoes, Dibden Road	This site has been assessed by the Council and there is no current evidence to suggest that the site is not deliverable within the plan period.	No change required to R17
R18: Former Start Rite Factory	This site has been assessed by the Council and there is no	No change required to R18

Appendix 2: Site Allocations Plan Review Table

Allocation	Evidence and change to local circumstance	Recommendation
Site, 28 Mousehold Lane	current evidence to suggest that the site is not deliverable within the plan period.	
R19: Land North of Windmill Road	This site has been assessed by the Council and there is no current evidence to suggest that the site is not deliverable within the plan period.	No change required to R19
R20: Starling Road	The Northern part of the site has been consented and developed. The Southern part of the site has also been consented but has not yet been developed. A further application is currently under consideration for the central part of the site. The site has been assessed by the Council and there is no current evidence to suggest that the site is not deliverable within the plan period.	As part of any future update of the Site Allocations Plan, R20 would not be included as the allocation will have been brought forward in full, assuming the site is built out in accordance with the granted permissions.
R21: Land at Aylsham Road	This site has been assessed by the Council and there is no current evidence to suggest that the site is not deliverable within the plan period.	No change required to R21
R22: 165-187 Aylsham Road	This site has been assessed by the Council and there is no current evidence to suggest that the site is not deliverable within the plan period.	No change required to R22
R23: Former Pupil Referral Unit, Aylsham Road	This site has been assessed by the Council and there is no current evidence to suggest that the site is not deliverable within the plan period.	No change required to R23
R24: Land adjoining Lime Kiln Mews	There is an application currently under consideration for this site. Should permission be granted and the site developed, the allocation will have come forward in full.	As part of any future update of the Site Allocations Plan, R24 would not be included if permission is granted and the site developed in full.
R25: 81-93 Drayton Road	This site has been assessed by the Council and there is no current evidence to suggest that the site is not deliverable within the plan period.	No change required to R25
R26: Site North of Raynham	This site has been assessed by the Council and there is no	No change required to R26

Appendix 2: Site Allocations Plan Review Table

Allocation	Evidence and change to local circumstance	Recommendation
Street	current evidence to suggest that the site is not deliverable within the plan period.	
R27: Goldsmith Street	The site has been developed and 93 of 105 dwellings have been completed. There is no current evidence to suggest that the remainder of the site is not deliverable within the plan period.	As part of any future update of the Site Allocations Plan, R27 would not be included as the allocation will have been brought forward in full, assuming the site is built out in full.
R28: 231-243 Heigham Street	This site has been assessed by the Council and there is no current evidence to suggest that the site is not deliverable within the plan period.	No change required to R28
R29: Two sites at Hurricane Way Airport Industrial Estate	This site has been assessed by the Council and there is no current evidence to suggest that the site is not deliverable within the plan period.	No change required to R29
R30: The Paddocks, Holt road	This site has been assessed by the Council and there is no current evidence to suggest that the site is not deliverable within the plan period.	No change required to R30
R31: Heigham Water Treatment Works	This site has been assessed by the Council and there is no current evidence to suggest that the site is not deliverable within the plan period.	No change required to R31
R32: 120-130 Northumberland Street	This site has been assessed by the Council and there is no current evidence to suggest that the site is not deliverable within the plan period.	No change required to R32
R33: Site at former Earl of Leicester Public House, 238 Dereham Road	This site has been assessed by the Council and there is no current evidence to suggest that the site is not deliverable within the plan period.	No change required to R33
R34: Land adjacent to and including 349a-349b Dereham Road	This site has been assessed by the Council and there is no current evidence to suggest that the site is not deliverable within the plan period.	No change required to R34
R35: Land at Havers road	This site has been assessed by the Council and there is no	No change required to R35

Appendix 2: Site Allocations Plan Review Table

Allocation	Evidence and change to local circumstance	Recommendation
	current evidence to suggest that the site is not deliverable within the plan period.	
R36: Mile Cross Depot	This site has been assessed by the Council and there is no current evidence to suggest that the site is not deliverable within the plan period.	No change required to R36
R37: Part of Norwich Community Hospital, Bowthorpe Road	This site has been assessed by the Council and there is no current evidence to suggest that the site is not deliverable within the plan period.	No change required to R37
R38: Three Score, Bowthorpe	The site has been partially developed with Phase 1 (care home) considered complete and Phase 2 (residential) under construction. The remainder of the site has been assessed by the Council and there is no current evidence to suggest that it is not deliverable within the plan period.	<p>Given that Phase 1 has already been delivered and Phase 2 is under construction, R38 could be updated to remove these areas from the allocation as part of any future review of the Site Allocations Plan.</p> <p>However, the rest of the site is still considered deliverable. Therefore no change is required to the remainder of R38.</p>
R39: Earlham Hall	This site has been assessed by the Council and there is no current evidence to suggest that the site is not deliverable within the plan period.	No change required to R39
R40: Former Blackdale School, University of East Anglia	This site has been assessed by the Council and there is no current evidence to suggest that the site is not deliverable within the plan period.	No change required to R40
R41: Land between Suffolk Walk and Bluebell Road, University of East Anglia	This site has been assessed by the Council and there is no current evidence to suggest that the site is not deliverable within the plan period.	No change required to R41

Appendix 2: Site Allocations Plan Review Table

Allocation	Evidence and change to local circumstance	Recommendation
R42: Land west of Bluebell Road, Bartram Mowers Limited.	This site has been assessed by the Council and there is no current evidence to suggest that the site is not deliverable within the plan period.	No change required to R42