Report to Norwich City Council

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an Inspector appointed by the Secretary of State for Communities and Local Government Date: 13th October 2014

PLANNING AND COMPULSORY PURCHASE ACT 2004 (AS AMENDED)
SECTION 20

REPORT ON THE EXAMINATION INTO THE NORWICH SITE ALLOCATIONS AND SITE SPECIFIC POLICIES LOCAL PLAN

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Abbreviations Used in this Report

AA Appropriate Assessment

DMP Norwich City Council Development Management Policies Local Plan

DtC Duty to Co-operate

GNDP Greater Norwich Development Partnership

JCS Joint Core Strategy for Broadland, Norwich and South Norfolk

LDS Local Development Scheme

LP Local Plan

MM Main Modification
NCC Norwich City Council

NPPF National Planning Policy Framework
ODPA Office Development Priority Area
PPG National Planning Policy Guidance

SA Sustainability Appraisal

SAP Norwich City Council Site Allocations and Site Specific Policies

Local Plan

SCI Statement of Community Involvement SCS Sustainable Community Strategy

SHLAA Strategic Housing Land Availability Assessment

SHMA Strategic Housing Market Assessment

This report is accompanied by 2 Appendices containing the Main Modifications. Appendix 1 contains the Main Modifications to the policies and text of the SAP, whilst Appendix 2 (which includes Annexes A-U) contains the Main Modifications to the Policies Map.

Non-Technical Summary

This report concludes that the Norwich Site Allocations and Site Specific Policies Local Plan provides an appropriate basis for the planning of the City, providing a number of modifications are made to the plan. Norwich City Council has specifically requested me to recommend any modifications necessary to enable the plan to be adopted.

The Main Modifications can be summarised as follows:

- Critical Drainage Catchments amend various policies to take account of additional evidence and reflect approach of the flood authorities;
- Policy CC2: 84-110 Ber Street delete policy;
- Policy CC4: 10-24 Ber Street reduce area of site;
- Policy CC11: Land at Garden Street, Norwich amend policy and text to allow temporary option for the provision of a primary school on the site;
- Policy CC18: Former Hunters Squash Club, Edward Street delete policy;
- Policy CC19a: Barrack Street allow flexibility with regard to hotel use;
- Policy CC19b: Whitefriars allow greater flexibility of uses;
- Policy CC23: Duke's Wharf, Duke Street accept Class D1 use on the site;
- Policy CC25: Norfolk House, Exchange Street delete policy;
- Policy CC28: Fire Station, Bethel Street delete policy;
- Policy CC31: St Stephens Street recognise that comprehensive development may not be viable and accept incremental development;
- Policy CC33: Westlegate Tower delete policy;
- Policy R2: Norfolk Learning Difficulties Centre, Ipswich Road delete reference to adjacent site:
- Policy R4: Hewlett Yard, Hall Road update status of site;
- Policy R8: John Young's Ltd., 24 City Road recognise increased capacity of site;
- Policy R11: Utilities Site, Cremorne Lane allow greater flexibility with regard to housing;
- Policy R12: Kerrison Road/Hardy Road, Gothic Works clarify access arrangements;
- Policy R13: 233-277 Aylsham Road reduce site area;
- Policy R14: Chalk Hill Works, Rosary Road delete policy;
- Policy R15: Gas Holder at Gas Hill recognise geo-diversity value;
- Policy R16: Land east of Bishop Bridge Road recognise geo-diversity value and clarify approach to gas holder;
- Policy R17: Land at Ketts Hill/Bishop Bridge Road recognise geo-diversity value;
- Policy R18: 124-128 Barrack Street reduce site area;
- Policy R19: Van Dal Shoes, Dibden Road update status of site;
- Policy R21: Sprowston Road/Land north of Windmill Road reduce site area;
- Policy R28: Site north of Raynham Street refer to pedestrian and cycle link in policy;
- Policy R31: Two sites at Hurricane Way, Airport Industrial Estate allocate southern part of Site B for housing;
- Policy R32: The Paddocks, Holt Road amend policy and text to set a two-year time limit to establish whether the site is required for Airport operational use and specify that the site is suitable for general needs employment after that period if not required for airport use;
- Policy R42: Earlham Hall provide greater flexibility with regard to floorspace figures;
- Policy R43: Former Blackdale School, University of East Anglia recognise the need to take a co-ordinated approach, having regard to the original vision for the university and feasibility considerations;
- Policy R44: Land between Suffolk Way and Bluebell Road, University of East Anglia recognise the need to take a co-ordinated approach, having regard to the original vision for the university and feasibility considerations;
- Policy R46: Land at Pointers Field delete policy;
- Additional site Land west of Bluebell Road, Bartram Mowers Ltd.- include policy and text to allocate the land as a housing scheme for the over-55s;
- Include new comprehensive monitoring framework in Appendix 3; and
- Include new glossary of terms in Appendix 4.

Introduction

- 1. This report contains my assessment of the Norwich Site Allocations and Site Specific Policies Local Plan (SAP) in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended). It considers first whether the Plan's preparation has complied with the duty to co-operate, in recognition that there is no scope to remedy any failure in this regard. It then considers whether the Plan is sound and whether it is compliant with the legal requirements. The National Planning Policy Framework (paragraph 182) (NPPF) makes clear that to be sound, a local plan should be positively prepared; justified; effective and consistent with national policy.
- 2. The starting point for the examination is the assumption that the local authority has submitted what it considers to be a sound plan. The submission plan (April 2013) is not the same as the pre-submission plan (August 2012) as the former includes various proposed changes made by the Council to address issues raised by representors at the pre-submission stage. These proposed changes were not the subject of consultation or sustainability appraisal. To avoid any confusion the examination was conducted on the basis of the wording of the pre-submission plan, having regard to the various proposed changes put forward by the Council and specifically identified in Document SD6.
- 3. My report deals with the Main Modifications that are needed to make the SAP sound and legally compliant. In accordance with section 20(7C) of the 2004 Act the Council requested that I should make any modifications needed to rectify matters that make the Plan unsound/not legally compliant and thus incapable of being adopted. These Main Modifications, and the associated changes to the Policies Map, are set out in the attached 2 Appendices.
- 4. The recommended Main Modifications that are necessary for soundness all relate to matters that were discussed at the Examination hearings or the subject of written representations. Following the Hearings, the Council prepared a schedule of proposed Main Modifications and carried out sustainability appraisal and this schedule has been subject to public consultation. I have taken account of the consultation responses on the proposed main modifications in coming to my conclusions in this report. As a result I have made a small number of amendments/deletions to the proposed Main Modifications and these are identified in my report and included in the recommended Main Modifications.
- 5. The Council has also compiled a schedule of Minor Modifications. Although I consider that these changes do not relate to matters of soundness interested parties are advised to view them in order to gain a complete picture of the wording of the emerging plan. The Council may also need to make minor edits, such as re-numbering policies, and factual updates in the final adopted version of the Plan.
- 6. The national Planning Practice Guidance (PPG) was issued after the hearings sessions. As a result I wrote to all representors to give them an opportunity of supplementing their representations in the light of the contents of the PPG. The responses received have been taken into account in my report.

7. My report on the SAP should be read in conjunction with my report relating to the Norwich Development Management Policies Local Plan (DMP) which is issued at the same time.

Assessment of Duty to Co-operate

- 8. Section s20(5)(c) of the 2004 Act requires that I consider whether the Council complied with any duty imposed on them by section 33A of the 2004 Act in relation to the Plan's preparation.
- 9. It is clear from the material submitted, including the Duty to Co-operate document [SD8], that the Council has engaged constructively with relevant bodies prescribed in s110 of the Localism Act 2011, together with other organisations, to ensure that cross boundary issues are properly coordinated and addressed.
- 10. There has been close collaboration between the Greater Norwich District Councils and the County Council on the Joint Core Strategy for Broadland, Norwich and South Norfolk (JCS), and its partial review, through the Greater Norwich Development Partnership (GNDP). Various joint studies dealing with cross-boundary issues in Greater Norwich, including housing, gypsy and travellers, employment, retail, transport, infrastructure, the environment and heritage assets, have been produced. The GNDP has now been replaced by the Greater Norwich Growth Board which will carry forward its work.
- 11. In terms of the wider area the Norfolk Strategic Planning Group, which includes representatives from the county's planning authorities, meets on a regular basis with a view to achieving consensus on core issues. A county-wide Duty to Co-operate Members' Forum was established in 2013. It is currently assessing the evidence that will be required in the future to ensure that local plans in the area address strategic issues effectively.
- 12. In the light of these findings I conclude that the Duty to Co-operate has been met.

Assessment of Soundness

Preamble

- 13. The SAP identifies about 80 sites, the majority of which are on brownfield land, to meet the development needs of Norwich in the period to 2026. The SAP, together with the DMP, and the already adopted Joint Core Strategy for Broadland, Norwich and South Norfolk (2011, amendments adopted 2014) and the Northern City Centre Area Action Plan (2010), will replace the City of Norwich Replacement Local Plan (adopted 2004) and all the planning policies therein.
- 14. A draft version of the SAP was published in January 2011 (alongside the draft DMP). In the light of comments received and the publication of the NPPF in March 2012 the draft was extensively revised and the pre-submission version was published in August 2012. The SAP was submitted to the Secretary of State for Examination on 16 April 2013.
- 15. The Examination hearings were provisionally arranged to start in September 2013. However I decided, after consulting the Council, to delay the

Examination hearings until early in 2014. This was to allow the Examination of the partial review of the JCS to be completed and the Inspector's report issued. This delay in the Examination also gave the Council the opportunity of bolstering its evidence base on a number of issues including the impact of the changes contained in the General Permitted Development Order 2013 and the viability of the allocated sites.

16. It is evident that the Council has sought to respond positively both to the comments received from the public and stake-holders during the earlier stages of the preparation of the SAP and to the representations received to the Pre-Submission plan. Whenever possible the Council has sought to resolve soundness issues by appropriate changes to policies or text. This approach has continued throughout the Examination with the result that a significant number of representations have been satisfactorily addressed. Such a process of constructive engagement is a vital ingredient of the local plan system and the Council's endeavours in this regard are to be commended.

Main Issues

17. Taking account of all the representations, written evidence and the discussions that took place at the examination hearings I have identified a number of main issues upon which the soundness of the Plan depends. These are dealt with below. Representations on the submitted SAP have been considered insofar as they relate to its soundness, but they are not reported on individually.

General Matters

Is the SAP consistent with the overall direction of the JCS and national policy and has it been positively prepared?

- 18. Regulation 8(4) of The Town and Country Planning (Local Planning)(England)
 Regulations 2012 specifies that subject to paragraph (5) the policies contained in a local plan must be consistent with the adopted development plan.
- 19. The JCS was adopted in March 2011 but was subject to legal challenge. As a result parts of the JCS concerning development proposals in the Broadland part of the Norwich Policy Area were remitted to Regulation 19 stage (formerly known as the pre-submission stage). The part JCS subsequently underwent public examination in 2013 and amendments to the adopted plan were adopted in January 2014.
- 20. The JCS identifies Norwich as a main focus for growth in the East of England for new homes and jobs, leisure, cultural and educational development. The SAP is in line with this approach and sets out in detail how the housing, employment, retail, leisure and educational development requirements of the JCS for the city are to be met. I have not identified any inconsistencies between the overall strategy for the city and the detailed allocation of sites. As a result I find the SAP to be consistent with the overall direction of the JCS.
- 21. The NPPF emphasises the importance of encouraging sustainable development through enabling economic growth and promoting housing development. Such a positive approach has been followed by the Council for many years and is inherent in the SAP. The Plan seeks to meet the identified needs of the city through a comprehensive set of allocations that have sustainable development

at their heart. Taking account of all the material before me I have not discerned any gaps in policy coverage. Consequently the SAP sits comfortably with the overall direction of the NPPF and is consistent with it. As the plan is based on a clear strategy that seeks to meet objectively assessed development and infrastructure requirements it has been positively prepared.

22. I conclude, therefore, that the SAP has been positively prepared, and is consistent with the overall direction of the JCS and national policy.

Are the policies and proposals in the SAP based on a robust and up-to-date evidence base?

- 23. The SAP is supported by a comprehensive evidence-base. Most of the material in the evidence base is of fairly recent origin. The Strategic Housing Market Assessment (SHMA) was originally prepared in 2007 but has subsequently been updated in 2009 and 2011. There is little to suggest that the general findings in the SHMA with regard to the housing required in the city are no longer relevant. The Strategic Housing Land Availability Assessment (SHLAA) and the work for the SAP demonstrate that there are sufficient deliverable and developable sites to meet the anticipated housing needs as required by the JCS.
- 24. Where necessary the Council has sought to update the information available by additional work and/or analysis, for instance with regard to viability. Topic papers have been produced for the Examination that updates the evidence base to take account of recent information, including the results of the Annual Monitoring Reports. A considerable amount of additional material and recent evidence has been produced by the Council in response to my questions. Consequently the policies and proposals contained in the SAP are based on a robust and up-to-date evidence base.
- 25. I conclude, therefore, the policies and proposals in the SAP are based on an robust up-to-date and evidence base.

Has sufficient regard been paid to infrastructure delivery & flood risk?

- 26. Throughout the preparation of the SAP the Council has carried out detailed consultation and engagement with a range of infrastructure providers. The amount of new development proposed in the plan will certainly give rise to a need for new and improved infrastructure. From the material available it is evident that the Council is seeking to identify any required works at an early stage. Appendix 7 of the JCS sets out details of the infrastructure required to support growth, including water, green infrastructure, transport and electricity. The Local Investment Plan and Programme contains updated information on these schemes. Additional site specific infrastructure is set out in the policies for the allocated sites. As a result there is a good prospect of the necessary infrastructure being in place at the appropriate time. The allocations in the plan, both individually and cumulatively, are not dependent on the provision of the proposed Norwich Northern Distributor Road.
- 27. The SAP has been informed by both Level 1 and 2 Strategic Flood Risk Assessments. This has meant that areas of fluvial flood risk have been identified and detailed consideration has been given to such areas in the city centre. The SAP policies have taken account of the findings. A Surface Water

Plan has identified areas at risk of flooding from heavy rainfall events and informed the definition of the boundaries of Critical Drainage Catchments. Again this work is reflected in the site allocation policies. The Environment Agency, together with the County Council, has been closely involved in all this work.

28. I conclude, therefore, that sufficient regard has been paid to infrastructure delivery and flood risk.

Have reasonable alternatives been considered and has the process involved in selecting sites been robust?

- 29. It is clear from the submitted plan and the supporting evidence that the Council considered reasonable alternatives before identifying the allocated sites, and their proposed uses, in the SAP. During the preparation of the plan over 170 sites were considered. Those identified as being suitable for particular uses were then assessed in terms of their availability, viability and sustainability, leading to the identification of about 80 preferred sites. Sustainability appraisal informed the process throughout and the public and stakeholders were given the opportunity to comment through several rounds of consultation.
- 30. Consequently I believe that the Council has adopted a thorough and systematic approach in the assessment of potential development sites with the result that, with the exception of one site (i.e. Bartram Mowers) dealt with below, those selected are the most suitable and appropriate when considered against the alternatives.
- 31. I conclude, therefore, that reasonable alternatives have been considered and the process involved in selecting sites has been robust.

Has due regard been taken of viability considerations and are the policies sufficiently flexible to take account of changing market conditions?

- 32. The Council's recent Viability Study (PS3) indicates that the great majority of the residential and mixed use developments proposed in the SAP are commercially viable. It is accepted that the study shows that the viability of high density residential development in the city centre is currently likely to be marginal. However sensitivity testing suggests that such developments would become viable with a very small reduction in the affordable housing requirement or a small increase in sales values. Given recent increases in house prices such schemes may well now be viable. In reaching this view I am mindful of recent local signals, including the re-commencement of significant high density residential development, including affordable housing, on land at Kerrison Road (Policy CC17), indicating an improvement in the market. In view of this it is reasonable to continue to allocate sites for high density residential development in the city centre.
- 33. Furthermore it is clear that flexibility has been built into each policy in terms of the mix of uses and scale of development. This will help to encourage the delivery of beneficial development even when market conditions are difficult. Policy DM33: Planning Obligations of the DMP (as to be modified) also makes clear that a flexible approach is to be taken to development proposals, that takes account of the impact on viability of planning obligations, site specific

- policy requirements, and the Community Infrastructure Levy.
- 34. I conclude, therefore, that due regard has been taken to viability considerations and that the policies are sufficiently flexible to take account of changing market conditions.

Housing

Is the approach to housing provision soundly based?

Housing need

- 35. The JCS identifies the Norwich Policy Area (defined as the Norwich urban area and the first ring of fringe villages) as the focus for major growth and development over the lifetime of the plan, with a requirement to deliver approximately 33,000 new homes in the NPA in the period from 2008 to 2026. In the city of Norwich area JCS Policies 4 & 9 require sites for at least 3,000 additional dwellings to be allocated over the plan period to accommodate this level of growth. These 3,000 dwellings are in addition to the 5,592 already committed for housing development through existing Local Plan allocations or planning permissions at the 2008 base date of the plan. JCS Policy 11 deals specifically with Norwich City Centre and indicates that a minimum of 2,750 dwellings, taking account of already committed development, will be required in the city centre between 2008 and 2026.
- 36. The JCS figures have been used by the Council to determine the amount of land that needs to be released for additional housing. I consider that this is the correct approach given that the SAP is required to be consistent with the adopted Core Strategy under the terms of Reg 8(4) of the Town and Country Planning (Local Planning) (England) Regulations 2012. If the overall housing requirements for the JCS area are to be re-assessed this should be in the form of a review of the JCS strategy. It is not the role of the SAP, which is clearly intended to implement and be consistent with the adopted JCS, to revisit the overall approach to the City's development needs or the strategy to deliver them.

Housing supply

- 37. The allocations in the SAP (taking account of the Main Modifications) amount to a total of just under 3,000 dwellings. Consequently it would appear at first sight that the amount of housing allocated in the SAP is not consistent with the JCS which requires site allocations for at least 3,000 additional dwellings. However this does not reflect the fact that some previous site allocations now have planning permission and are delivering housing. Furthermore I consider that it is necessary to take account of other likely sources of housing supply over the plan period.
- 38. There is a strong history of windfall development within the City with an average of 230 homes per year delivered on windfall sites in the period 2001-2013. The Council, on the basis of the lowest annual windfall delivery figure during the period 2001-2013, estimate that a minimum of 150 dwellings per year could be delivered on windfall sites. As a result the Council estimate that about 1650 additional homes could be provided on windfall sites within the City in the period to 2026. On the basis of past rates of delivery of housing on

windfall sites this appears to me to be a reasonable assessment of what is likely to happen and the inclusion of windfall figures in the housing trajectory is justified.

- 39. It is evident from prior approvals of the change of use of offices to residential in the City that a number of additional housing units are likely to be delivered in this way over the next few years. The allocation of the Bartram Mowers site for over 55's housing in the SAP, which is dealt with below, would add further additional dwellings. Taken together the evidence indicates that additional sources of supply would be likely to provide about another 200 dwellings in the plan period.
- 40. The PPG also indicates that in assessing housing land supply account can also now be taken of the provision of accommodation for students and within residential institutions (C2 housing). From the material before me it does not appear that the council has recent information on the accommodation needs of students or residential care needs. As a result it is not possible to estimate how the provision of additional bed-spaces in these sectors might release homes on to the market. Without such information I believe that the incorporation of student and institutional completions within the housing land supply calculations is unjustified.
- 41. When the additional sources of housing supply are taken together with the dwellings allocated in the SAP additional provision approaches 5,000 dwellings. Taking account of outstanding planning permissions, sites with a resolution to approve, sites allocated in the adopted local plans without permission, and completions since 2008 there are about another 6,350 units to add to the housing supply figures.
- 42. Consequently provision is made for over 11,000 dwellings between 2008 and 2026 compared to the JCS Policy 4 requirement of a minimum of 8,592 dwellings. This means that provision is about 28% higher than the JCS minimum requirement. Such a level of provision is in line with the exhortations in the NPPF to boost housing supply.
- 43. Given the work that the Council has carried out with regard to viability and the intentions of site owners I am confident that most of the sites allocated in the SAP are likely to be deliverable within the plan period. However experience indicates that it is unlikely that all commitments and allocations will be delivered or be developed in the form intended. In view of this there is a need for a fair degree of flexibility in the figures and this is provided for when all the various sources of housing supply are taken into account.

Five year supply of housing land in the City

44. The NPPF states that where there has been a record of persistent under delivery of housing, a buffer of 20% should be added to the housing provision figures to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land. In my view there is no evidence of persistent under-delivery of housing within the City. Rather a considerable amount of new housing has been delivered, even in the past few years when economic conditions have been challenging. Consequently I find no justification for including a buffer of 20%.

- 45. The Council has supplied detailed figures (31 March 2013) on the five year housing land supply position for the City including a 5% buffer. These are contained in the Addendum to the Housing Topic Paper (JD15.1): April 2013 update (Document ED25). The figures indicate that there is 7.55 years supply of housing land according to the 'Liverpool' methodology and 5.7 years if the 'Sedgefield' approach is followed. Although the annual residual requirement is higher than recent annual completion rates it is still below levels achieved when the economy was buoyant. On the basis of the information supplied I accept that there is a 5 year supply of housing land in the City in accordance with NPPF guidance.
- 46. In order to monitor the effectiveness of the JCS with regard to housing land provision there is a need to measure 5 year land supply across the NPA. However I do not consider that such an exercise is necessary in determining the soundness of the SAP given that provision in the SAP is consistent with the JCS requirement for Norwich city.

Housing trajectory

- 47. Norwich experienced unprecedented housing development in the last decade, rising annually from 2001 and peaking at over 1000 dwellings in 2007/08. Since the onset of the recession in 2008, delivery has reduced to below 400 dwellings annually in 2009/10 and in 2010/11, and fell to 280 dwellings in 2011/12. However there has been an upturn in 2012/13 with delivery in Norwich rising to 377 dwellings.
- 48. The housing trajectory estimates that housing delivery is expected to rise gradually in the short term to peak at similar rates to those achieved in recent years at over 1000 per year in 2016/7 and 2017/18. It is estimated that housing delivery rates are then likely to fall as the only major greenfield site in the city at Three Score is developed and brownfield opportunities are reduced. Given current improving market conditions and the work that the Council has undertaken with regard to the intentions of site owners and viability I consider that the estimates that underlie the housing trajectory are reasonably based.

Distribution

49. In line with national planning policy the JCS aims to maximise the potential for sustainable brownfield development within Norwich in order to reduce the need for greenfield development in the rest of the NPA. The examined SAP provides for a total of over 3,000 dwellings from 2008 to 2026 in the city centre compared to a minimum 2,750 dwellings requirement from the JCS. Currently of the 3,856 dwellings with permission in the city, 2,052 are on city centre sites. Consequently the distribution of housing provision is in line with both national and local planning policies.

Type and size of housing

50. JCS Policy 4 requires proposals for housing to contribute to the mix of housing required to provide balanced communities and meet local needs, including affordable housing and housing with care. Within the City there is no rigid calculation of specific numbers and sizes of dwellings required to meet local needs. Rather it is left to the developer to determine having regard to local needs, planning and housing policies, and the advice of relevant bodies. This

flexible approach accords with national guidance and has been successful in providing an appropriate supply of housing to meet the needs of the area, including a significant amount of affordable housing.

51. I conclude, therefore, that the approach to housing provision is soundly based.

Employment

Is the overall approach to employment growth soundly based?

- 52. Although the JCS does not contain any specific targets for additional employment land or new jobs it stresses the critical employment role of the city to the economic well-being of the area. In recognition of the important role that office development should continue to play in the area's economy JCS Policy 5 indicates that provision should be made for at least 100,000 square metres of new office floor space in the city centre. The JCS also contains a commitment to the regeneration of existing employment sites.
- 53. It is evident from the material submitted that the SAP, and the associated DMP, are consistent with the JCS in terms of employment policy and are based on a thorough understanding of the business needs of the City. The main components of the Council's approach in the two plans to employment growth are:
 - ensuring that, wherever appropriate, employment and/or office use is included within the site allocations. Of the 78 allocated sites in the SAP, 34 (24 in the city centre and 10 in the rest of the city) contain these uses as part of the proposed mix of development;
 - allocating additional employment land, whilst accepting that certain previously designated employment sites are best re-allocated or suited to a mix of uses;
 - the safeguarding of the majority of existing employment areas, whilst providing for the redevelopment and intensification of employment uses within them;
 - identifying in the DMP an Office Development Priority Area (ODPA) in the city centre to encourage major office development on a number of key city centre sites and move towards the 100,000 square metres additional requirement;
 - including policies designed to encourage employment and business development, including small and medium size operations;
 - encouraging development at locations that are vital to the economy of the area, including the city centre, Norwich Airport and the University of East Anglia.
- 54. As regards viability the Viability Study indicates that small and large mixed use sites in the city centre that include an office element are likely to be viable. Although single use employment sites in suburban locations are not viable in present market conditions the study concludes that an increase in

- land values of about 5% would make them viable. Consequently I consider that such sites have a reasonable prospect of delivery given current improving market conditions.
- 55. In my view the plans contain a comprehensive and robust set of employment policies and proposals designed to contribute to the achievement of a prosperous local economy. I conclude, therefore, that the overall approach to employment growth is soundly based.

Other Matters

Is there an effective monitoring framework?

- 56. At present the LP is unsound as it does not contain a monitoring framework to assess the efficacy of LP policies. Main Modification **SA-MM35** corrects this omission.
- 57. It is concluded that, subject to the inclusion of Main Modifications **SA-MM35**, the LP is soundly based.

Is there a need for a glossary of terms?

- 58. To aid understanding of the LP it is sensible to including a glossary of the terms used. Main Modification **SA-MM36** contains such a glossary.
- 59. It is concluded that, subject to the inclusion of Main Modifications **SA-MM36**, the LP is soundly based.

Site Specific Policies

60. A number of the site specific policies in the SAP are not specifically referred to in this report. Furthermore where policies are referred to, only particular elements are usually discussed. This is because the report focuses on those parts of the plan where there may be soundness issues.

Are the various site specific policies soundly based?

Critical Drainage Catchments

61. Recent additional evidence has led to the identification of larger critical drainage catchments. These are contained within Main Modification PM-MM13 which amends the Policies Map in relation to DMP Policy DM5 Critical Drainage Areas/Catchment. This change, coupled with the need to require the submission of a flood risk assessment or surface water management assessment with proposals in such areas, necessitates changes to various site specific policies. The sites are CC24 (Barn Road Car park), CC26 (Pottergate car park), CC35 (Westwick Street Car park), R13 (233-277 Aylsham Road), R19 (Van Dal Shoes, Dibden Road), R20 (Former Start Rite Factory Site, 28 Mousehold Lane), R21 (Land north of Windmill Road), R22 (Starling Road), R23 (Land at Aylsham Road), R24 (165-187 Aylsham Road), R25 (Former Pupil Referral Unit, Aylsham Road), R28 (Site north of Raynham Street), R29 (Goldsmith Street), and R31 (2 sites at Hurricane Way, Airport Industrial Estate). Main Modification SA-MM1 encompasses these changes.

- 62. These changes are justified on the basis that they take account of recent evidence, bring the policies into line with national policy on flood risk, and reflect the approach of the flood authorities.
- 63. It is concluded that, subject to the inclusion of Main Modification **SA-MM1**, Policies CC24 (Barn Road Car park), CC26 (Pottergate car park), CC35 (Westwick Street Car park), R13 (233-277 Aylsham Road), R19 (Van Dal Shoes, Dibden Road), R20 (Former Start Rite Factory Site, 28 Mousehold Lane), R21 (Land north of Windmill Road), R23 (Land at Aylsham Road), R22 (Starling Road), R24 (165-187 Aylsham Road), R25 (Former Pupil Referral Unit, Aylsham Road), R28 (Site north of Raynham Street), R29 (Goldsmith Street), and R31 (2 sites at Hurricane Way, Airport Industrial Estate) are soundly based subject to any other Main Modifications that are recommended below.

East Norwich sites

- 64. Policy 12 of the JCS indicates that there are major physical regeneration opportunities for mixed use development and enhanced green linkages in east Norwich.
- 65. The SAP seeks to implement this strategic policy for east Norwich with site allocations for the Deal Ground (Policy R10), the Utilities site (Policy R11), the Gothic Works (R12) and the Kerrison Road site (CC17). In my view the allocation policies for these four sites will secure a co-ordinated approach to the development of the area, particularly in relation to access (explained in Hearing document ED21), and ensure that comprehensive development is secured. It is also clear that viability and deliverability considerations have shaped the content and mix of uses contained in the policies.
- 66. I conclude, therefore, that the overall approach to the development of the East Norwich sites is soundly based, subject to any detailed recommended Main Modifications specified below.

City Centre Site Specific Allocations

Policy CC2: 84-110 Ber Street

- 67. The owner of this site has indicated that the site is no longer available for development within the plan period. As development on the site will not be delivered Policy CC2 is not effective and its deletion is justified. Main Modification **SA-MM2** secures its deletion from the Plan and Policies Map.
- 68. It is concluded that Policy CC2: 84-110 Ber Street is not soundly based and requires deletion by Main Modification **SA-MM2.**

Policy CC4: 10-24 Ber Street

69. There has been a change in ownership of the southern part of the site and this part of the site is no longer available for development. As a result the site is much smaller in area. To reflect this, the description of the site needs to be altered, the number of dwellings that could be accommodated reduced from 30 to 10, and the access arrangements clarified. As development of the southern part will not now be delivered Policy CC4 is not effective and

revisions are required. Main Modification **SA-MM3** includes these changes. This modification also refers to the need to take account of possible contamination on the site. In the interests of highway safety the access should be located close to the southern boundary of the site. The resultant modifications to the Policies Map are shown in Annex A.

70. It is concluded that, subject to the inclusion of Main Modification **SA-MM3** and the modifications to the Policies Map shown in Annex A, Policy CC4: 10-24 Ber Street is soundly based.

Policy CC9: King Street Stores

- 71. The CC9 allocation is located between King Street and the River Wensum and is occupied by a warehouse building and courtyard. It is allocated for a minimum of 20 dwellings.
- 72. I do not consider that there are grounds for the inclusion of the Wensum Sports Centre (formerly the Lincoln Ralphs Sports Hall), which lies just to the north, within an extended CC9 allocation. This centre is an extremely important sporting and leisure facility that is cherished by the local community. In addition to a sports hall there are two squash courts and other indoor spaces used for various activities. The Sports Centre is operated by a charitable association and since re-opening in November 2012 has been well-used and popular. Grant aid to improve both its external appearance and the facilities offered is currently being explored.
- 73. The Sports Centre is in a highly sustainable location within the south-east part of the city centre and is well-placed to serve the needs of those living in the area. The evidence available indicates that whilst Norwich has a reasonable supply of sports halls, these are operating near capacity and would be unable to accept any displaced demand if the sports hall at Wensum Sports Centre closed. There would be limited space on the site to replace the facilities lost if residential development were to be allowed, whilst cost is likely to prevent reprovision on another site, even if such a site could be found in the area.
- 74. In view of this there are strong grounds for the retention of the Sports Centre and the encouragement of its improvement. This approach is in line with Paragraph 70 of the NPPF which draws attention to the need 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. I have taken account of various other relevant considerations including the advantages of comprehensive regeneration of the area, the townscape benefits to the Conservation Area and the setting of nearby buildings, the unattractive appearance of the Sports Centre building, and its short term tenancy. However these matters, even if taken together, do not justify the loss of such an important local asset.
- 75. I conclude, therefore, that Policy CC9: King Street Stores is soundly based and the extension of the allocation to include the Wensum Sports Centre is not justified.

Policy CC11 - Land at Garden Street

76. Policy CC11 allocates this 1.08 ha site for mixed use development (i.e. about

100 dwellings and an element of small scale office/business units).

- 77. The County Council has identified a need for an additional primary school in the school planning area comprising Lakenham, Mancroft and Thorpe Hamlet Wards and Trowse in South Norfolk. The school is likely to be needed around 2020-2021. Whilst preliminary work by the County Council has found that the CC11 site may be suitable for such development, no detailed evidence has been produced to assess the potential of other sites in the school planning area to deliver the required provision.
- 78. It is considered that the site is in a good location for a primary school. It sits within a predominantly residential part of the city and is in close proximity to the city centre. Consequently it is well-placed to serve the primary educational needs of the local area and take advantage of sustainable transport links. There do not appear to be any alternative, suitable sites of this size or location in the surrounding area.
- 79. In the light of this and to ensure the proper planning of the area it is sensible to allow the County Council a temporary period of 4 years from adoption of the SAP to undertake an assessment of alternative school sites, establish whether a primary school is required on site CC11, and submit a planning application. This length of time is required for the County Council to complete the required work and submit a planning application. It would also be important to ensure that in the event that the site is not required for a school the policy still allows for a housing-led mixed use development. Main Modification **SA-MM4** makes the necessary changes to the Policy CC11 and the supporting text.
- 80. There is an identified need to retain public car parking in the area. Consequently it is reasonable and legitimate for the City Council to require school development, as with a mixed use scheme, to make provision for replacement public car parking in the vicinity of the site through direct provision or through a commuted sum to extend existing car parks.
- 81. It is concluded that, subject to the inclusion of Main Modification **SA-MM4**Policy CC11: Land at Garden Street is soundly based.

Policy CC18: Former Hunters Squash Club, Edward Street

- 82. As the development on this site has now been completed it needs to be removed from the SAP. Main Modification **SA-MM5** deletes Policy CC18 from the plan.
- 83. It is concluded that as the development on the Policy CC18: Former Hunters Squash Club site has been delivered it requires deletion by Main Modification **SA-MM5.**

Policy CC19a: Barrack Street

- 84. Policy CC19a allocates the site for a comprehensive mixed use development of offices, housing and a hotel.
- 85. In view of the uncertainty about the viability of a hotel on the site it is considered that the policy should be made more flexible in this regard. Consequently Main Modification **SA-MM6** makes it clear that a hotel could be

included as part of the development, subject to viability. A number of other changes relating to the provision of a public square, flood risk, the consent of the Environment Agency, and contamination are required to delete unnecessary detail and provide clarity on the development of the site. These modifications will make for an effective policy.

86. It is concluded that, subject to the inclusion of Main Modification **SA-MM6**Policy CC19a: Land at Barrack Street is soundly based.

Policy CC19b: Whitefriars

- 87. Policy 19b allocates the site for office development.
- 88. This site is identified by JCS Policy 11 as being within an area of change suitable for commercial development. The site also lies within the Office Development Priority Area (ODPA) as defined by Policy DM19 of the DMP. Given this, and the sustainable location close to bus routes and the railway station, the site is well-suited for office development. However it is considered that greater flexibility in the policy to allow ancillary uses related to office development such as small scale retail, café uses, and some housing, may help the delivery of development. A simple change in the policy wording to refer to 'office-led mixed use development' is, therefore, considered justified. Two other changes relating to flood risk and the consent of the Environment Agency are required to provide clarity on the development of the site. Main Modification **SA-MM7** covers these points.
- 89. It is concluded that, subject to the inclusion of Main Modification **SA-MM7** Policy CC19b: Whitefriars is soundly based.

Policy CC23: Duke's Wharf, Duke Street (Former EEB offices)

- 90. Policy CC23 allocates this site for a mix of uses including offices, and potentially a residential scheme of up to 30 dwellings, small scale retail units, food and drink uses, professional services, and an hotel. The policy is designed to be flexible because a range of uses is potentially appropriate in this sustainable city centre location. Furthermore such an approach is likely to facilitate delivery of this brownfield site.
- 91. It is considered that to increase the likelihood of its development the uses deemed appropriate on the site should also include Class D1 use (Non-residential institutions). This would be in line with recent initiatives in the city centre, including the grant of university status for the College of Art, which may lead to the provision of additional educational facilities. Such an approach would also accord with the NPPF and JCS which both strongly support the expansion of schools and further education and training facilities. Four other changes relating to the description of the site, flood risk and the consent of the Environment Agency, and conversion and demolition, are required to provide clarity on the development of the site. Main Modification **SA-MM8** covers these points.
- 92. It is concluded that, subject to the inclusion of Main Modification **SA-MM8**, Policy CC23: Duke's Wharf, Duke Street (Former EEB offices) is soundly based.

Policy CC25: Norfolk House, Exchange Street

- 93. As a new higher education facility has been completed on the site the CC25 allocation needs to be removed from the plan. Main Modification **SA-MM9** deletes Policy CC25 from the plan.
- 94. It is concluded that as the Policy CC25: Norfolk House, Exchange Street site is no longer available it requires deletion by Main Modification **SA-MM9.**

Policy CC28: Fire Station, Bethel Street

- 95. As a sixth form free school has been provided on the site the CC28 allocation needs to be removed from the plan. Main Modification **SA-MM10** deletes Policy CC28 from the plan.
- 96. It is concluded that as the Policy CC28: Fire Station, Bethel Street site is no longer available it requires deletion by Main Modification **SA-MM10.**

CC29: Chantry Car Park

- 97. Policy CC29 allocates the site for a mix of uses including retail / café / leisure / art / entertainment uses on the ground floor and mixed uses (including retail and/or offices) on upper floors.
- 98. This allocation enables the intensification of retail and leisure uses in a highly sustainable location next to the Chapelfield shopping centre. This approach is in line with the St Stephens masterplan which provides overall guidance on the area's development. I consider that the policy provides an appropriate amount of guidance given the site's sensitive location within the historic heart of the city centre. Consequently I find no justification for an increased amount of flexibility in the policy wording.
- 99. It is concluded, therefore, that Policy CC29: Chantry Car Park is soundly based.

Policy CC31: St Stephens Street

- 100. Policy CC31 allocates the site for a comprehensive mixed use scheme to include primarily retail development, office and residential uses on upper floors and a new pedestrian link to the bus station from St Stephens Street.
- 101. The Council's aim of securing comprehensive development across this important and prominent city centre site merits strong support and accords with the JCS. However the information submitted indicates that a comprehensive scheme may not be viable in current market conditions. Consequently it is sensible to revise the policy to refer specifically to the need to take account of viability and provide a clear policy direction in the event that comprehensive development proves unviable. In particular there is a need to identify which parts of the site, including existing buildings, will be suitable for retail, office or housing uses. Main Modification **SA-MM11** addresses this point.
- 102. As the principles inherent in the St Stephens Street Area Masterplan are reflected in the policy there is no need to refer specifically to the masterplan in

the policy.

103. It is concluded that subject to the inclusion of Main Modification **SA-MM11**, Policy CC31: St Stephens St is soundly based.

Policy CC32: Land and buildings at the junction of St Stephens Street and Westlegate

- 104. As the principles inherent in the St Stephens Street Area Masterplan are reflected in the policy there is no need to refer specifically to the masterplan in the policy.
- 105. It is concluded that Policy CC32: Land and buildings at the junction of St Stephens Street and Westlegate is soundly based.

Policy CC33: Westlegate Tower

- 106.As this site is currently being developed for 19 housing units and A1 retail and A3 restaurant uses the CC33 allocation needs to be removed from the plan. Main Modification **SA-MM12** deletes Policy CC33 from the plan.
- 107. It is concluded that as the site is being developed Policy CC33: Westlegate Tower requires deletion by Main Modification **SA-MM12.**

Remainder of the City

Policy R2: Norfolk Learning Difficulties Centre, Ipswich Road

- 108.At present one of the requirements of Policy R2 is for the site to be considered with the former garage to the north to enable a more comprehensive, coordinated scheme. As the garage site is under different ownership and is separated from the allocation by a public footpath such a stipulation may prejudice the implementation of development on the R2 site. Consequently in order to make for a more effective policy Main Modification **SA-MM13** deletes the reference to the former garage site.
- 109. It is concluded that, subject to the inclusion of Main Modification **SA-MM13**, Policy R2: Norfolk Learning Difficulties Centre, Ipswich Road is soundly based.

Policy R3: Hall Road District Centre

110. The relationship of the Hall Road retail park to the Hall Road District Centre is discussed in the report on the DMP in relation to Policy DM25 – Use and removal of restrictive conditions on retail warehousing and other retail premises.

Policy R4: Hewlett Yard, Hall Road

- 111. Hewlett Yard is now included on the extended local list of buildings of architectural and historic interest adopted by the Council in January 2014. Main Modification **SA-MM14** brings the status of the site up-to-date.
- 112. It is concluded that, subject to the inclusion of Main Modification **SA-MM14**, Policy R4: Hewlett Yard, Hall Road is soundly based.

Policy R5: Part of school playing field of Hewett School

- 113. This site, which lies within the Hewett school campus, is allocated for a family and community support centre for students and the local community. The development would involve the loss of disused hard tennis courts and grassland not used for sport for a number of years.
- 114. The Norwich Open Space Needs Assessment 2007 indicates that the minimum standard for outdoor sports space in this part of the city is met. Since then significantly improved sports facilities have been provided on the nearby all-weather football and hockey pitches. The remaining extensive school playing fields will continue to provide a wide range of sports pitches and facilities, including grass tennis courts. In the light of this I consider that the benefits to the local community of the proposed facility outweigh the retention of disused sports facilities. This finding broadly accords with local and national planning policy.
- 115. The boundary of the allocation requires amendment on the Policies Map to reflect the completed adjoining development. Main Modification **PM-MM12** and the associated **Annex O**, contains this boundary change.
- 116. It is concluded, therefore, that subject to the inclusion of Main Modification **PM-MM12**, Policy R5: Part of school playing field of Hewett School is soundly based.

Policy R8: John Young's Ltd., 24 City Road

- 117. Policy R8 currently requires the retention and conversion to residential use of the Victorian building in the north-east corner of the site.
- 118. Whilst it is considered that this Victorian building has some limited heritage interest it has been extensively altered and extended and is, therefore, neither statutorily listed nor on the city council's local list. Consequently it is unreasonable for Policy R8 to insist on its retention and conversion, although this is a desirable aspiration. In recognition of the increased scope for new development on the site the number of dwellings is changed to a minimum of 45 dwellings. Main Modification **SA-MM15** includes the necessary changes.
- 119.It is concluded that, subject to the inclusion of Main Modification **SA-MM15**, Policy R8: John Young's Ltd., 24 City Road is soundly based.

Policy R10: The Deal Ground, Trowse

120. This site now has outline planning permission for a mixed use development, including up to 670 dwellings and a range of commercial uses. When this application was determined regard was paid to adjacent land uses in particular the minerals aggregate depot and processing plant and railhead. It was found, on the basis of detailed reports and assessments, that there was no justification for resisting development on the basis of noise, dust or odour pollution. Furthermore the permission demonstrates that it was held that the future of adjoining land uses would not be threatened by the permitted scheme.

- 121. Given this it would be inequitable at this stage to modify Policy R10 to require further work to be carried out with regard to noise, dust and odour pollution. It is not the function of a local plan to introduce further controls on a site once a scheme has been approved and material considerations addressed. Rather the appropriate approach is to ensure that the reserved matters are carefully assessed, having regard to the conditions attached to the outline planning permission. Clearly it will also be necessary for the appropriate authorities to ensure over the coming years that any controls over the operation of adjacent land uses are complied with.
- 122. The proposed bridge over the River Wensum between the Deal Ground site and the Utilities site (R11) is a key element in the development of these two sites and the wider area. Policy R10 indicates that the vehicular use of this bridge shall be restricted to emergency vehicles, cycles and potentially buses. I consider this limitation to be appropriate as general vehicular access from the Deal ground through the Utilities site to Kerrison Road/ Carrow Road area would be likely to cause unacceptable highway effects, including high levels of congestion, in this part of the city. Matters of detailed design of the bridge, such as specific clearance height, are detailed matters for the Broads Authority as navigation authority when determining planning applications for the river. It is understood that the approved scheme for the bridge is in line with the Authority's requirements.
- 123. It is concluded that Policy R10 The Deal Ground, Trowse is soundly based. Consequently Proposed Main Modification SA-MM16 is not taken forward.

Policy R11: Utilities Site, Cremorne Lane

- 124. Policy R11 currently states that the mixed use development of the site should provide in the region of 100 dwellings.
- 125. It is considered that to provide greater flexibility and allow more housing to be secured on the site if deemed appropriate, the policy should be revised to a minimum of 100 dwellings. Main Modification **SA-MM17** makes this change. For the sake of clarity this modification also replaces the term 'residential moorings' with the 'public moorings and/or private moorings serving new residential development' and refers to the need to involve the Environment Agency with regard to various matters affecting the site. There is no need to refer specifically to the site's suitability for leisure, cultural and or educational facilities as such uses are not precluded by the policy.
- 126. It is concluded that, subject to the inclusion of Main Modification **SA- MM17**, Policy R11: Utilities Site, Cremorne Lane is soundly based.

Policy R12: Kerrison Road/Hardy Road, Gothic Works

127. The current wording of Policy R12 implies that the proposed access through the site to Site R11 is only for emergency vehicles. However the intention is to enable people and vehicles to use this access point to leave the R11 site in the event of an emergency and for servicing that site. Main Modification **SA-MM18** makes this clear. In my view general vehicular access through the site to the Policy R11 site would be likely to cause unacceptable highway effects, including high levels of congestion, in this part of the city.

- 128. There is insufficient justification at the present time for including a bus dropoff point on the site although I am sure that the Council would react positively to such a proposal if it were to be demonstrated that the benefits of such a scheme outweighed any drawbacks.
- 129. For clarification the proposed modification also refers to the need to involve the Environment Agency with regard to various matters affecting the site.
- 130. It is concluded that, subject to the inclusion of Main Modification **SA-MM18**, Policy R12 Kerrison Road/Hardy Road, Gothic Works is soundly based.

Policy R13: 233-277 Aylsham Road

- 131. This site is in 4 land ownerships. One of the landowners has confirmed that they intend to develop their land separately with 4 dwellings, whilst another has confirmed that there is no intention to develop their industrial units within the plan period. To reflect this and ensure an effective policy Main Modification **SA-MM19** excludes these 2 areas, reduces the number of dwellings to be accommodated accordingly, makes it clear that a mix of flats and houses would be appropriate, and recognises that account needs to be taken of the potential noise from the retained industrial units. In the interests of clarity this Modification also refers to flood risk and contamination. The resultant modifications to the Policies Map are shown in **Annex B**. These modifications are required to produce an effective policy.
- 132.It is concluded that, subject to the inclusion of Main Modification **SA-MM19** and the modifications to the Policies Map shown in **Annex B**, Policy R13: 233-277 Aylsham Road is soundly based.

Policy R14: Chalk Hill Works, Rosary Road

- 133.As this site is currently being developed for 28 dwellings the Policy R14 allocation needs to be removed from the plan. Main Modification **SA-MM20** deletes Policy R14 from the plan.
- 134. It is concluded that as the R14: Chalk Hill Works, Rosary Road site is currently being developed this allocation requires deletion by Main Modification **SA-MM20**.

Policy R15: Gas Holder at Gas Hill

- 135. This site is adjacent to the chalk scarp face and consequently to ensure an effective policy there is a need to protect and enhance its geo-diversity value. Main Modification **SA-MM21** changes the policy accordingly. For clarification this modification also refers to the need to involve the Environment Agency because of the site's location within Source Protection Zone 1.
- 136. It is concluded that, subject to the inclusion of Main Modification **SA- MM21**, Policy R15: Gas Holder at Gas Hill is soundly based.

Policy R16: Land east of Bishop Bridge Road

137. This site is adjacent to the chalk scarp face and consequently to ensure an effective policy there is a need to protect and enhance its geo-diversity value.

Main Modification **SA-MM22** amends the policy accordingly. For clarification this modification also refers to the need to involve the Environment Agency because of the site's location within Source Protection Zone 1. It also makes clear that development of the site will depend on the successful decommissioning of the gasholder and revocation or surrender of its hazardous substance consent.

138. It is concluded that, subject to the inclusion of Main Modification **SA-MM22**, Policy R16: Land east of Bishop Bridge Road is soundly based.

Policy R17: Land at Ketts Hill/Bishop Bridge Road

- 139. This site is is adjacent to the chalk scarp face and consequently to ensure an effective policy there is a need to protect and enhance its geo-diversity value. Main Modification **SA-MM23** changes the policy accordingly. For clarification this modification also refers to the need to involve the Environment Agency because of the site's location within Source Protection Zone 1.
- 140. It is concluded that, subject to the inclusion of Main Modification **SA-MM23**, Policy R17: Land at Ketts Hill/Bishop Bridge Road is soundly based.

Policy R18: 124-128 Barrack Street

- 141. The western part of the site (124 Barrack Street) has been redeveloped to provide a dentist surgery and associated parking. To ensure an effective policy this part of the site should be removed from the allocation and the number of proposed housing units reduced from 30 to 15. This, together with a number of other consequential amendments, is included within Main Modification **SA-MM24.** The resultant modifications to the Policies Map are shown in Annex C.
- 142. It is concluded that, subject to the inclusion of Main Modification **SA-MM24** and the modifications to the Policies Map shown in **Annex C**, Policy R18: 124-128 Barrack Street is soundly based.

Policy R19: Van Dal Shoes, Dibden Road

- 143. This site is now included on the extended local list of buildings of architectural and historic interest adopted by the Council in January 2014. Main Modification **SA-MM25** brings the status of the site up-to-date.
- 144. It is concluded that, subject to the inclusion of Main Modification **SA- MM25**, Policy R19: Van Dal Shoes, Dibden Road is soundly based.

Policy R20: Former Start Rite Factory Site, 28 Mousehold Lane

- 145. This site is allocated for redevelopment for about 40 dwellings.
- 146.I do not consider that the Policy R20 site should be allocated for a mix of uses, including a food store. A foodstore on the site would have a significant impact on the viability and vitality of the defined centre at Sprowston Road/Shipfield, which lies close-by. The retail function of the Sprowston Road/Shipfield centre has recently been reinforced by the construction of a new foodstore, its recategorisation as a district centre, and enlargement of its boundaries. Consequently allowing retail development on the Policy R20 allocation would

be in conflict with national and local retail policies.

147. It is concluded that Policy R20: Former Start Rite Factory Site, 28 Mousehold Lane is soundly based.

Policy R21: Sprowston Road/Land north of Windmill Road

- 148.On the southern part of this site an Aldi food store has opened for trading and work has commenced on building 9 residential units. To ensure an effective policy this part of the site should be removed from the allocation and the number of proposed housing units reduced accordingly from 25 to 10. This, together with a number of other consequential amendments, is included within Main Modification **SA-MM26.** The resultant modifications to the Policies Map are shown in Annex D.
- 149. It is concluded that, subject to the inclusion of Main Modification **SA-MM26** and the modifications to the Policies Map shown in **Annex D**, Policy R21: Sprowston Road/Land north of Windmill Road is soundly based.

Policy R28: Site north of Raynham Street

- 150. Although the explanatory text to Policy R28 refers to the opportunity to improve the currently unattractive strategic Dolphin Path pedestrian and cycle link there is no specific reference to this in the policy wording. Main Modification **SA-MM27** makes good this omission and is required to ensure that Policy R28 is comprehensive and effective.
- 151. It is concluded that, subject to the inclusion of Main Modification **SA-MM27**, Policy R28: Site north of Raynham Street is soundly based.

Policy R31: Two sites at Hurricane Way, Airport Industrial Estate

- 152. Policy R31 allocates these two sites for light industrial development and/or for small business use.
- 153. It is considered that the southern part of Site B (the eastern part) is suited to residential development given the adjoining areas of housing to the south and west and would allow for a planned interface between employment and residential uses. A masterplan would be required to guide development on the sites. Such an approach accords with national guidance and the JCS.
- 154. Proposed Main Modification **SA-MM28** specifies that the housing on Site B would be dependent on funding regeneration. This requirement is considered unnecessary given the policy already specifies the associated improvements required. As the masterplan will determine the appropriate number of dwellings on the site Proposed Modification SA-MM28 is in need of revision to make it clear that 30 units is an assumption to be used for calculating the site's contribution to the JCS housing requirement.
- 155. It is concluded that, subject to the inclusion of Main Modification **SA-MM28** (as revised), Policy R31: Two sites at Hurricane Way, Airport Industrial Estate is soundly based.

Policy R32: The Paddocks, Holt Road

- 156. Policy R32 allocates this site for airport operational uses to enable the further expansion of the airport. The policy indicates that the need for the land for operational uses will be established by means of the impending masterplan to be prepared by the airport authority.
- 157. It is accepted that as the site lies between the airport and the A140 Holt Road it is well-suited to possible airport use. However as the policy stands it is too open-ended and could lead to long-term uncertainty about the future of this piece of land. The airport authority has confirmed that work is to commence on the preparation of the airport masterplan in 2015. Given this it is reasonable to modify the policy to allow a period of 2 years from the adoption of the SAP for the masterplan to establish whether the site is required for airport operational purposes. In the event that the site is not required in view of the location of the site on the edge of the built-up area, near to other employment uses and next to a principal road it would be appropriate for general needs employment uses, which may or may not be airport related. Main Modification **SA-MM29** revises the policy accordingly and is required to make the policy effective. It is anticipated that in order to minimise the number of accesses onto the A140 access to any development would be from Gambling Close. However the modification does not rule out alternatives, including direct access from Holt Road, if it can be demonstrated that there is no significant impact on highway safety.
- 158. It is concluded that, subject to the inclusion of Main Modification **SA-MM29**, Policy R32: The Paddocks, Holt Road is soundly based.

Policy R35: 120-130 Northumberland Street

- 159. This housing allocation provides for a cycle and pedestrian link between Armes Street and Bramfield Close. As the site is in several ownerships it needs to be developed comprehensively. I consider that a cycle and pedestrian link through the site is reasonable and would help the safe and free movement of cyclists and pedestrians through the area. Consequently this element of the policy is justified.
- 160. It is concluded, therefore, that Policy R35: 120-130 Northumberland Street is soundly based.

Policy R39: Mile Cross Depot

- 161. This 3.65 ha site is allocated for mixed use development to include a minimum of 75 dwellings and small business workshop units. I consider that the figure of a minimum of 75 dwellings is based on a careful appraisal of the capacity of the site and its constraints. The density is in line with the SAP's strategic aim of promoting medium/high density housing development on brownfield sites in edge of city locations.
- 162. It is concluded, therefore that Policy R39: Mile Cross Depot is soundly based.

Policy R42: Earlham Hall

163. The current policy specifies that the proposed new building in the former

- nursery garden and redundant glasshouse area should be a maximum of 7000 square metres, whilst the proposed new building on the former depot should be a maximum of 3000 square metres.
- 164. These floor space figures have been determined on the basis of the likely capacity of the site taking account of the need to protect heritage assets and landscape features. In order to provide some flexibility and to avoid being overly precise it is considered that these figures should be approximate rather than maxima. This would make for a more effective and realistic policy that takes account of the sensitive nature of the site. Main Modification **SA-MM30** makes the required change and also clarifies matters with regard to flood risk on the site.
- 165.It is concluded that, subject to the inclusion of Main Modification **SA-MM30**, Policy R42: Earlham Hall is soundly based.

Policy R43: Former Blackdale School, University of East Anglia

- 166. At present no mention is made in the policy of the need to take a coherent and co-ordinated planning approach to this site and the importance of involving English Heritage, UEA and the City Council. Furthermore there is no reference in the policy of the regard that should be paid to Lasdun's original vision for the development of the university. These are significant omissions from the policy that are rectified by Main Modification **SA-MM31**. The revised wording would allow for the possibility of different forms of supplementary guidance for the site rather than a purely design-led masterplan.
- 167. The current policy requires this campus extension to be linked to the university district heating network. It is considered, however, that in determining whether the proposed development should be so linked account needs to be taken of feasibility considerations. Main Modification **SA-MM31** also secures this change and would make Policy R43 more capable of delivery.
- 168. It is concluded that, subject to the inclusion of Main Modification **SA-MM31**, Policy R43: Former Blackdale School, University of East Anglia is soundly based.

Policy R44: Land between Suffolk Way and Bluebell Road, University of East Anglia

- 169. At present no mention is made in the policy of the need to take a coherent and co-ordinated planning approach to this site and the importance of involving English Heritage, UEA and the City Council. Furthermore there is no reference in the policy of the regard that should be paid to Lasdun's original vision for the development of the university. These are significant omissions that are rectified by Main Modification **SA-MM32.**
- 170. The current policy requires this campus extension to be linked to the university district heating network. It is considered, however, that in determining whether the proposed development should be so linked account needs to be taken of feasibility considerations. Main Modification **SA-MM32** also secures this change and would make Policy R43 more capable of delivery.
- 171.I consider that as site allocations R42 and R43 are brownfield sites they should

be developed before the Policy R44 allocation, which is greenfield. This would accord with one of the fundamental aims of the SAP to secure the efficient use of previously developed land. Furthermore although the transport impact of sites R42 and R43 have been assessed a more rigorous review of transport impacts would be required if the R44 allocation is brought forward. Notwithstanding this if highway and environmental matters can be satisfactorily addressed and the two brownfield sites are shown not to be appropriate for the intended use the Council can take a pragmatic view to the release of the Policy R44 site.

172. It is concluded that, subject to the inclusion of Main Modification **SA-MM32**, Policy R44: Land between Suffolk Way and Bluebell Road, University of East Anglia is soundly based.

Policy R46: Land at Pointers Field

- 173. As the development on this site is nearing completion it needs to be removed from the SAP. Main Modification **SA-MM34** deletes Policy R46 from the plan.
- 174. It is concluded that Policy R46: Land at Pointers Field is not soundly based and requires deletion by Main Modification **SA-MM34.**

Are additional site specific housing allocations justified?

175. As part of the examination I have had regard to whether any housing sites in addition to those included in the SAP should be identified. It is clear from my assessment of housing land supply earlier in the report that I consider that sufficient provision has been made to meet overall housing requirements. Consequently additional sites for general needs housing are not required. However there are particular factors, including the brownfield nature of a substantial portion of the land and various associated benefits, favouring the release of the Bartram Mowers site for an over 55's housing scheme.

Land west of Bluebell Road, Bartram Mowers Ltd.

- 176. The development of this sustainably located and partly brownfield site for over-55s housing, which could include assisted-living, extra care housing, would meet an identified local and city-wide need for this type of accommodation. Improved housing choice in this part of the city would result. The existing uses on the site mean that there is already built development within this part of the Yare Valley. A housing allocation here would enable the creation of an extensive area of publicly accessible open space within the valley and provide opportunities for enhancing biodiversity. Cringleford would still be separated from the edge of Norwich by a substantial area of undeveloped land. I conclude that the considerable benefits associated with the scheme outweigh the visual harm that would result. Utilising brownfield land and meeting identified housing needs, together with providing access to green space and enhancements to biodiversity are all important components of national planning policy. The need to meet the accommodation needs of older people is also recognised in the JCS and is inherent in national policy.
- 177. Given its sensitive location built-development needs to be limited to the previously developed land on the north-western part of the site and the field to the south-east. It is vital that the layout, height and appearance of the

buildings, and the associated open areas and landscaping, are carefully designed to minimise the impact of the development on the character of the Yare Valley and important views. Such matters should be determined in an agreed masterplan based on landscape and visual appraisals, topographical and level surveys, and ecological studies. The appropriate number of dwellings for the site will arise as a result of this work. Specifying the number of units and the areas where the height of development is to be restricted would be too prescriptive at this stage. The material before me indicates that satisfactory access can be provided to the site and that the amount of traffic generated would not have an unacceptable impact on the surrounding road network.

- 178. Main Modification **SA-MM33** allocates this site for development and specifies the approach that needs to be taken to its development. Main Modification **PM-MM15** (**Annex S**) amends the Policies Map accordingly.
- 179. It is concluded that apart from the allocation of the Bartram Mowers site for over-55s housing, in accordance with Main Modification **SA-MM33** and **PM-MM15** (Annex S), there is no justification for the release of any additional site specific housing allocations.

Assessment of Legal Compliance

- 180. The SA that accompanied the pre-submission plan reflected the contents of the draft Regulation 19 SAP. The draft plan contained a few more sites than the pre-submission plan. The SA accompanying the submission plan reflects the allocations in the plan. During the Examination the SA has been revised to ensure that it appraises the contents of the SAP as proposed to be modified.
- 181. My examination of the compliance of the Plan with the legal requirements is summarised in the table below. I conclude that the Plan meets them all.

LEGAL REQUIREMENTS	
Local Development Scheme (LDS)	The SAP is identified within the approved LDS. The SAP has been prepared in accordance with the listing and description in the LDS.
Statement of Community Involvement (SCI) and relevant regulations	The SCI at the time of submission was that adopted in March 2010. Subsequent to submission a new SCI was adopted in July 2013. Consultation has been compliant with the requirements within these documents, including the consultation on the post-submission proposed 'main modification' changes (MM)
Sustainability Appraisal (SA)	SA has been carried out appropriately and is adequate.
Appropriate Assessment (AA)	The Habitats Regulations AA Screening Report (December 2010) sets out why AA is not necessary.
National Policy	The SAP complies with national policy except where indicated and modifications are recommended.
Sustainable Community Strategy (SCS)	Satisfactory regard has been paid to the SCS.
Public Sector Equality Duty (PSED)	The SAP complies with the Duty.
2004 Act (as amended) and 2012 Regulations.	The SAP complies with the Act and the Regulations.

Overall Conclusion and Recommendation

- 182. The SAP has a number of deficiencies in relation to soundness for the reasons set out above which mean that I recommend non-adoption of it as submitted, in accordance with Section 20(7A) of the Act. These deficiencies have been explored in the main issues set out above.
- 183. The Council has requested that I recommend Main Modifications to make the Plan sound or legally compliant and capable of adoption. I conclude that with the recommended Main Modifications set out in the Appendices the Norwich Site Allocations and Site Specific Policies Local Plan satisfies the requirements of Section 20(5) of the 2004 Act and meets the criteria for soundness in the National Planning Policy Framework.

Christopher Anstey

Inspector

This report is accompanied by 2 Appendices containing the Main Modifications. Appendix 1 contains the Main Modifications to the policies and text of the SAP, whilst Appendix 2 (which includes Annexes A-U) contains the Main Modifications to the Policies Map.

Main modifications to Regulation 19 Site Allocations and Site Specific Policies plan

REF	PAGE	POLICY / SITE	MAIN MODIFICATION
SA-MM1	Various	Various (CC24, CC26, CC35, R13, R19, R20, R21, R22, R23, R24, R25, R28, R29, R31)	the explanatory text and the new sentence to the end of each policy to reference Critical Drainage
			SA-MM1a: Sites under 1ha:
			CC24: Barn Road car park
			CC26: Pottergate car park
			CC35: Westwick Street car park
			R19: Van Dal Shoes, Dibden Road
			R20: Former Start Rite Factory Site, 28 Mousehold Lane
			R21: Land North of Windmill Road
			R22: Starling Road
			R24: 165-187 Aylsham Road
			R25: Former Pupil Referral Unit, Aylsham Road
			Explanatory text: 'The site lies within a critical drainage catchment as identified on the Policies
			Map. Therefore development proposals involving new buildings, extensions and additional areas
			of hard surfacing should ensure that adequate and appropriate consideration has been given to
			mitigating surface water flooding in accordance with policy DM5.

REF	PAGE	POLICY / SITE	MAIN MODIFICATION
			Policy: 'A surface water management assessment should be submitted with any application proposing development in accordance with this allocation. The assessment should show how the proposed development:
			a) would not increase the vulnerability of the site, or the wider catchment, to flooding from surface water run-off from existing or predicted water flows; and b) would, wherever practicable, have a positive impact on the risk of surface water flooding in the
			wider area.' SA-MM1b: Sites over 1ha:
			R13: 261-277 Aylsham Road R23: Land at Aylsham Road R28: Site North of Raynham Street R29: Goldsmith Street
			R31: Two Sites at Hurricane Way, Airport Industrial Estate NB for these sites any existing reference to the need for a flood risk assessment will be deleted and
			replaced by the following text: Explanatory text: 'Since the site is over 1ha a flood risk assessment is required and appropriate
			mitigation measures shall be provided as part of the development. As the site also lies within a critical drainage catchment as identified on the Policies Map, a surface water management assessment should be included in the flood risk assessment. Development proposals involving
			new buildings, extensions and additional areas of hard surfacing should ensure that adequate and appropriate consideration has been given to mitigating surface water flooding in accordance with policy DM5.
			Policy: 'A flood risk assessment including a surface water management assessment should be submitted with any application proposing development in accordance with this allocation. The assessment should show how the proposed development:
			 a) would not increase the vulnerability of the site, or the wider catchment, to flooding from surface water run-off from existing or predicted water flows; and b) would, wherever practicable, have a positive impact on the risk of surface water flooding in the

REF	PAGE	POLICY / SITE	MAIN MODIFICATION
			wider area.'
SA-MM2	49-51	CC2/84-110 Ber Street	Delete policy and supporting text, and delete site from policies map.
SA-MM3	55-58	CC4/10-14 Ber Street	Amend supporting text as set out below, and amend policies map to reflect reduction in site size (see plans at annex A) and re-insert requirement for access to be located as close to the southern boundary of the site as possible with a vehicular access to be provided across the site to join with the site to the rear of 6-8 Ber Street. Policy change:
			 'Policy CC4: 10 to 24 14 Ber Street – mixed use development The site at 10-24 14 Ber Street is allocated for redevelopment for a mix of uses including: Retail or complementary uses in A2, A3. (at ground floor level) Office development; Residential uses on upper floors (a minimum of 30 10 dwellings).
			 The development must be designed to: be well integrated with the sites to the north and south, which currently has planning permissions be integrated to the site to the south strengthen the building line along Ber Street enhance the setting of the listed and locally listed buildings in the vicinity respect the topography of the area be accessed from Ber Street towards the southern end of the site.'
			Supporting text:
			'CC4: 10 – 24 14 Ber Street Description

REF	PAGE	POLICY / SITE	MAIN MODIFICATION
			The site is 0.25 0.1 hectare in size and is located on the eastern side of Ber Street and is close to the junction with All Saints Green and Golden Ball Street. It comprises a range of uses, including open storage, warehouse, residential and retail units vacant building at number 10 with the site of 12-14 adjacent, previously used as open storage land.
			This site is on the fringe of the primary shopping area. It has an open, incoherent street frontage and the buildings are dated and of poor quality with a mix of building sizes and character. No 10 is dated and of poor quality, and the site of number 12-14 comprises open storage land. The Council's City Centre Conservation Area Appraisal (CCCAA) identifies the buildings on the site as 'negative buildings', detracting from the character of the conservation character area. There are a number of listed and locally listed buildings directly opposite the site on the west side of Ber Street.
			Ber Street has been a major route out of the City since at least the 12th century, and is thought to have originally been a Roman Road. Its use as a cattle drove to the old cattle market adjacent to the Castle is reflected in its unusual width. Today, following bomb damage during the Second World War and subsequent redevelopment, the street is fragmented in character, with remnants of its earlier character apparent but with much mid 20th century local authority housing. The wider area is predominantly residential with some office development, and other commercial uses along Ber Street.
			Explanatory text
			The Joint Core Strategy promotes the city centre as the main focus in the sub-region for retail, leisure and office development, with housing and educational development also adding to the vibrancy of the centre. The key diagram for the city centre identifies the site as being within an 'area of change' where the focus of change is through mixed use development (including commercial, <u>retail</u> and residential).
			Redevelopment of this site for a mix of uses including residential, offices and retail will help deliver the Joint Core Strategy's wider policy objectives by contributing to the improved vibrancy

REF	PAGE	POLICY / SITE	MAIN MODIFICATION
			of this part of the city centre and strengthening the city's sub-regional role. In this location, a mix of appropriate commercial uses could successfully link with the promoted regeneration of the Westlegate and Timberhill areas.
			Development of the site must address a number of constraints including its location within the city centre conservation area and the area of main archaeological interest, and its location adjacent to listed buildings and possible contamination.
			The development of the site provides an opportunity to deliver a vibrant mixed use site fronting Ber Street, which will contribute positively to the character of the street, and will remove 'negative' buildings which currently detract from its streetscape and character. The St Stephens Street Outline Masterplan promotes redevelopment of the site for a mix of uses, including retail uses at ground floor level along Ber Street, with residential units and private gardens to the rear of the site at ground floor level, and with residential uses on upper floors. It proposes that the scale of buildings on the site should be 3 storeys to reflect the scale of surrounding development.
			The site is suitable for around 30 10 dwellings as part of a mixed use development, with some retail and/or office development along the Ber Street frontage, and an element of office development residential above and to the rear. Development must enhance the setting of the neighbouring listed buildings and reflect its location in the city centre conservation area. Its design must re-instate a strong building line along the street frontage, whilst respecting the area's important topography and neighbouring uses. Opportunities for provision of on street parking and servicing on Ber Street should be considered (including if appropriate provision of a car club space).
			Vehicular access to the site should provide access to car parking only via a carriage arch off Ber Street. The site is suitable for car free housing given its sustainable location and the provision of a car club space on Ber Street would be welcomed. An access across the site to the development to the rear of 6-8 Ber Street is required and any entrance point onto Ber Street should be located towards the southern boundary of the site.
			The development must also enhance the public realm and streetscape in line with the St Stephens

REF	PAGE	POLICY / SITE	MAIN MODIFICATION
			Street Outline Masterplan.
			An archaeological investigation will be required prior to development.
			Deliverability
			The site was formerly part of Local Plan allocation for housing development of 30 dwellings in mix with retail, office, or leisure uses. This site is owned by Norwich City Council and is suitable and available for development within the plan period.'
SA-MM4	81-85	CC11/Garden Street	Amend policy and supporting text as follows:
			POLICY CC11: Land at Garden Street – mixed use development (with temporary option for primary school development) Land at Garden Street is allocated for housing led mixed use development including: in the region of 100 dwellings; an element of small scale office/business units to cater for small businesses. Replacement public parking spaces will be provided as part of the scheme. Vehicle access should be via Garden Street and not off Rouen Road. For a period of 4 years from adoption of the plan, an option for development of the site for a primary school will be considered. This will be dependent on production of a detailed study by Norfolk County Council, agreed with Norwich City Council, by the end of 2016 assessing whether this is the most appropriate site for such development in the school planning area. If the study shows: that an alternative site is more suitable for the primary school, the temporary option for school development will cease to apply from January 2017; that the Garden Street site is the most suitable school site, a planning application will be

REF	PAGE	POLICY / SITE	MAIN MODIFICATION
			School development would be required to make provision for replacement public car parking in the vicinity of the site through direct provision or a commuted sum to extend existing car parks. School development would have to implement the car parking standards for educational development in this part of the city centre, providing one operational car parking space per ten classrooms. Any Development must be designed to protect neighbour amenity, protect and enhance the wooded ridge to the east and south of the site, and to provide enhanced landscaping, green
			infrastructure and improved pedestrian and cycle links through the site. An archaeological assessment is required prior to development. A flood risk assessment and any necessary flood mitigation measures are required. Description The site includes land on both sides of Garden Street and is 1.08 hectares in size. The site contains a surface car park and light industrial buildings, mainly used for motor related businesses. The conservation area appraisal identifies the buildings on the site as 'negative buildings', detracting from the character of the conservation area.
			The site is surrounded by a mix of uses, predominantly residential flats and some office and light industrial buildings. The site is partially surrounded to the east and south by the Ber Street wooded ridge which is an ecological link and a publicly accessible open space. This part of the city centre is a very mixed area with a combination of industrial and residential uses. There is a large housing area set back from the main streets, mostly in cul-de-sacs off Rouen
			Road. The houses are in blocks, often surrounded by empty green spaces and parking areas or garage blocks. This lay out provides very little visual enclosure to the street, with few buildings directly fronting onto it. The repetitive design together with the lack of detailing of much of this housing forms a contrast with the remaining traditional properties. A large section of the west side of Rouen Road is surface car parking, again providing no enclosure. Normandie Tower, a large

REF	PAGE	POLICY / SITE	MAIN MODIFICATION
			residential tower block, is to the south of the site.
			Explanatory text The Joint Core Strategy promotes the city centre as the main focus in the sub-region for retail, leisure and office development, with housing and educational development also adding to the vibrancy of the centre. The key diagram for the city centre identifies the site as being within an 'area of change' where the focus of change is through mixed use development including small scale offices/business units and residential development.
			This area is identified as an area of change and development will positively contribute to the regeneration of the Ber Street and Rouen Road area. Development will also present an opportunity to improve the townscape of Rouen Road and enhance green infrastructure.
			Development must address the site's main constraints which include its location in the City Centre conservation area and area of main archaeological interest, its topography with land sloping down to the south east of the site and its location adjacent to the Ber Street wooded ridge. Ground conditions are a potential constraint as this is the site of former chalk workings. Long leases on some of the existing light industrial units may also be a constraint.
			Relatively high density development is possible in this highly accessible city centre site. The large surface car park, although presenting a negative view along Rouen Road, serves an important function in this part of the city centre and public parking should be incorporated into redevelopment, possibly by incorporating it into the lower levels with a visual curtain of active frontage to the street. Redevelopment should also cater for the needs of small businesses in the city centre area by providing small business units as part of the comprehensive development.
			The design principles of the development should establish street frontages onto Rouen Road and Thorn Lane. It should also enhance the adjacent Ber Street wooded ridge, and provide for enhanced green infrastructure and landscaping within the site and links to the proposed Norwich Cycle Network which runs along this section of Rouen Road. Vehicular access should be taken from Garden Street, not onto Thorn Lane.

REF	PAGE	POLICY / SITE	MAIN MODIFICATION
			Norfolk County Council has identified that there is a need for an additional primary school in the school planning area. This area broadly covers Lakenham, Mancroft and Thorpe Hamlet wards and includes Trowse in South Norfolk. The school is likely to be needed around 2020 to 2021. Whilst early work has identified that the Garden Street site may be suitable for such development, no detailed evidence has been produced to assess the potential of other sites in the school planning area to deliver the required provision.
			Therefore the policy includes a temporary option for consideration for development for school use for 4 years after adoption of the plan. This would enable a sufficient lead in time for a new school, if needed on this site, to be in place by 2020/21. To enable this, a planning application would have to be submitted by the April 2018.
			It would also enable the site to be developed for housing led mixed use development during the plan period if it is not required for school development. If the study produced by Norfolk County Council by the end of 2016 shows that an alternative site is more suitable for the primary school, the temporary option for school development will cease to apply from January 2017.
			If a school were to be permitted on the site, replacement public car parking would be required in the vicinity as there is a need to retain car parking provision in this part of the city centre. The replacement public parking could be provided either through direct provision or through a commuted sum to extend existing car parks.
			School development would have to implement the car parking standards for educational development in this part of the city centre required by Policy DM31 "Car parking and Servicing" and set out in appendix 3 of the Development Management policies plan, providing one operational car parking space per ten classrooms.
			Given its location, an archaeological investigation will be required prior to development of the site. Since the site is over 1 hectare, a flood risk assessment is required and appropriate mitigation measures should be provided as part of the development.

REF	PAGE	POLICY / SITE	MAIN MODIFICATION
			Deliverability
			The land is owned by the City Council and available for redevelopment in the plan period.
SA-MM5	107-109	CC18/Former Hunters Squash Club, Edward Street	Delete policy, supporting text and remove from policies map.
SA-MM6	110-113	CC19a/Barrack Street	6.1 Amend policy CC19a as follows:
			"POLICY CC19a Barrack Street
			 Land at Barrack Street is allocated for a comprehensive mixed use development to include: offices (with ancillary retail uses); and housing (in the region of 200 dwellings) together with associated public open space and playspace provision; and a hotel. Subject to viability, development could also include a hotel as part of the mix. The development should: Integrate and enhance the cycle link as part of the scheme;
			 Provide access to the river and riverside walk; and Respect the setting of the city wall and the adjacent conservation area and; and Provide a public square to enhance the setting of the city wall."
			6.2 Amend text as follows: in the 4th paragraph of explanatory text: add <u>"The site is also over 1 hectare in size."</u> after " Flood Zone 3a."
			6.3 Amend text as follows: after the end of the 4th paragraph, add "The site may also be subject to possible contamination."
			6.4 Amend text as follows: add a new paragraph after the 4th paragraph: "This site lies adjacent to

REF	PAGE	POLICY / SITE	MAIN MODIFICATION
			the River Wensum. A written consent from the Environment Agency is required for proposed works or structures, in, under, over or within 9 metres of the top of the bank of a designated 'main river'. It is recommended that developers engage in early discussions with the Environment Agency."
SA-MM7	114-116	CC19b/Whitefriars	7.1 Amend the first sentence of policy CC19b as follows:
			"Land at Whitefriars is allocated for office <u>led mixed use</u> development."
			7.2 Amend text as follows: In the 4th paragraph of the explanatory text, add <u>"and is over 1 hectare in size"</u> after " Flood Zone 2"
			7.3 Amend text as follows: Add a new paragraph after the 4th paragraph: "This site lies adjacent to the River Wensum. A written consent from the Environment Agency is required for proposed works or structures, in, under, over or within 9 metres of the top of the bank of a designated 'main river'. It is recommended that developers engage in early discussions with the Environment Agency. The site may also subject to possible contamination."
SA-MM8	126-129	CC23/Duke's Wharf	8.1 Amend second sentence of policy CC23 (following the 2 bullet points) as follows:
			"Uses falling within Class D1 (non-residential institutions) and hotel use may also be acceptable on this site. Hotel use may also be acceptable on this site."
			8.2 Amend text as follows: under Description (paragraph 1, second line) to replace "derelict" with "vacant", for clarification.
			8.3 Amend text as follows: move existing fifth paragraph to follow on from new paragraph detailed below in 8.4 and make amendments as follows: "The site is adjacent to the river Wensum and Part of it the site falls within flood zones 2 and 3."
			8.4 Amend text as follows: Add a new paragraph after the end of the second paragraph of the

REF	PAGE	POLICY / SITE	MAIN MODIFICATION
			explanatory text: "This site lies adjacent to the River Wensum. A written consent from the Environment Agency is required for proposed works or structures, in, under, over or within 9 metres of the top of the bank of a designated 'main river'. It is recommended that developers engage in early discussions with the Environment Agency." 8.5 Amend text as follows: Add new fourth sentence to paragraph 3 of explanatory text for clarification: "Development proposals that retain and convert the building on the Duke Street frontage will be given favourable consideration." Also add new sentence to end of paragraph 3 for clarification: "Demolition would need to be clearly justified on the grounds of the quality of any
			new development, although the demolition of the former Eastern Electricity Board offices is likely to be acceptable."
SA-MM9	134-137	CC25/Norfolk House	Delete policy and supporting text, and amend policies map accordingly.
SA-MM10	144-146	CC28/Fire Station, Bethel Street	Delete policy, supporting text and remove from policies map.
SA-MM11	154-157	CC31/ St Stephens Street	DELETE the policy and text and replace with the following: CC31: St Stephens Street
			Description
			The site is located in the St Stephens Street area and is 1.5 hectares in size. The site mainly comprises shops along St Stephens Street and two seven-storey towers which are currently empty but were previously used as offices. The site also contains the grade II* listed Bignold House on Surrey Street, and a multi-storey car park on the corner of St Stephens Street and Queens Road.
			The site is surrounded by a wide range of uses. The bus station is located immediately east of this site adjoining the inner ring road. The recent Chapelfield shopping mall development opposite is the largest retail development in Norwich and also contains residential apartments.

REF	PAGE	POLICY / SITE	MAIN MODIFICATION
			The wider St Stephens area is almost exclusively in retail use, although service industries (banks, estate agents, etc) and restaurants, cafés and bars are also spread throughout. Some buildings are in office use above ground floor level. The area contains the majority of large department stores, shopping malls and national chains in the city centre. St Stephens Street is the major route into the city from the south-west.
			As a result the street is busy with both pedestrians and traffic and is characterised by large buildings or blocks of buildings. While many of the buildings on the site date from the mid to late 20th century, it includes historic buildings and the area is also important archaeologically. The main routes are wide with spaces often at the junction of streets, indicating the former market uses of the area. The adopted Norwich Area Transportation Strategy (NATS) includes the removal of general traffic from St Stephen's Street and the designation of nearby Surrey Street as a strategic cycle route.
			The City Centre Conservation Area Appraisal identifies the majority of buildings on the site as 'negative buildings', including the two tower blocks; the view towards the St Stephens roundabout from St Stephen Street is also identified as a 'negative vista'. However the street frontage on St Stephens Street is defined as 'positive', and the north part of the site also contains some listed and locally listed buildings.
			Explanatory text
			The Joint Core Strategy identifies the Stephen's Street area as an area of change requiring comprehensive regeneration. It states that the St Stephen's area will be developed for mixed uses in accordance with the St Stephen's Street Area Outline Masterplan, to promote retailing, offices and housing and to create an improved pedestrian environment.
			The development of this site has the potential to make a significant contribution to the regeneration of the wider area. It presents an opportunity to secure major enhancement of the St Stephen's gateway area through creation of a high quality streetscape, with a more attractive public realm and pedestrian friendly environment.

REF	PAGE	POLICY / SITE	MAIN MODIFICATION
			Development proposals should address the site's constraints which include its location in the city centre conservation area and area of main archaeological interest; its location as a gateway site to the city centre, the need for major demolition, and existing shop leases and parking arrangements.
			The St Stephen's Street Outline Masterplan sets out indicative plans for development of the site as part of the overall regeneration of the area. The "high intervention" scheme put forward in the masterplan proposes eventual demolition of a significant part of the site including the two towers and some shops, and redevelopment for 250 dwellings, 8,270 m2 of offices, 470 m2 of retailing and 92 underground parking spaces. Retail uses are promoted at street level with a mix of uses on upper floors.
			A new pedestrian linkage is proposed, from St Stephens Street to the Bus Station to improve accessibility; this could potentially include a new public open space to act as a focal point in the scheme, subject to viability. Scale of development would vary, ranging from 3 – 4 storeys along the St Stephen's Street frontage up to 7-storey at its junction with the inner ring road.
			The council's aim is the comprehensive development of this site to reflect its potential as a focus for city centre mixed use regeneration including housing, the expansion of employment and provision of appropriate main town centre services and facilities. However the policy also allows for incremental development to take place if it can be demonstrated that a comprehensive scheme is not viable, to allow for the re-use and redevelopment of the existing buildings on the site. Any proposals must demonstrate consistency with the other policies in the development plan, with particular emphasis on achieving a high quality of design and amenity.
			Development should also take account of the City Centre Conservation Area Appraisal. Given that development is likely to be phased due to existing long leases on some shops, a development brief should be produced to guide subsequent planning applications.
			As the site is more than 1 hectare in size, a flood risk assessment and appropriate mitigation measures will be required. In addition an archaeological assessment will be required prior to development.

REF	PAGE	POLICY / SITE	MAIN MODIFICATION
			Deliverability The entire site and buildings are in a single ownership by Aviva Investors. The landowner has expressed their intention to bring the development forward during the plan period. The site is therefore suitable and available for development.
			The St Stephens Street site is allocated for a comprehensive mixed use development, which is to include:
			• The provision of a new pedestrian link to the bus station from St Stephens Street subject to technical and financial viability considerations.
SA-MM12	162-165	CC33/Westlegate Tower	Delete policy and supporting text, and delete site from policies map.
SA-MM13	179-182	R2/Norfolk Learning Difficulties Centre	Amend policy by deleting second paragraph linking development of site to the former garage site:

REF	PAGE	POLICY / SITE	MAIN MODIFICATION
			Developers should investigate the potential for developing the site together with the former garage site to the north to enable a more comprehensive, co-ordinated scheme.
SA-MM14	186-189	R4/Hewett Yard, Hall Road	Amendment of paragraph 1 of the explanatory text and the policy wording to update reference to locally listed buildings:
			Paragraph 1 of explanatory text: "Hewett Yard was originally constructed in the 1940s during World War Two as a local civil defence HQ and ambulance station, the latter role continuing in peacetime. The buildings were adapted as lock up garages and low cost accommodation for small businesses in the early 1980s. The site operates with benefit of planning permission for light industrial and warehousing use dating from 1982. In recognition of its early civil defence role in the local community the buildings are it is proposed for inclusion on the council's expanded local list of buildings of architectural and historic interest. If confirmed as locally listed and are therefore subject to the requirements of it would then be subject to development management policy DM9 which will require justification for the loss of a locally identified heritage asset and providing (in the event of redevelopment) for the appropriate recording of the heritage interest of the site and its inclusion in the Heritage Environment Record. Some form of on site heritage interpretation is also likely to be required. Policy DM7 provides for the protection of trees along the southern and as appropriate the western boundaries. Policy wording:
			POLICY R4: Hewett Yard, Hall Road Hewett Yard, Hall Road is allocated for housing development. In the region of 20 dwellings will be provided.
			Development will:
			• take vehicular and pedestrian access from Hall Road (seeking, where practicable, to rationalise the number of separate vehicular access points serving the site and adjoining sites);

REF	PAGE	POLICY / SITE	MAIN MODIFICATION
			• retain and enhance the established tree belt along the Hall Road frontage and safeguard the Tree Preservation Order trees alongside the southern boundary of the site during construction;
			 address any identified need for decontamination and remediation of the site; and
			• provide for the recording of the heritage significance of existing [locally listed] buildings and include appropriate heritage interpretation within the site.
			A noise assessment is required, and design must mitigate the impact on future residents of traffic noise and noise from neighbouring uses.
SA-MM15	195-197	R8/John Youngs Ltd, City Road	Amend policy R8 as follows:
		City Noad	POLICY R8: John Youngs Limited, 24 City Road
			24 City Road is allocated for housing development. In the region of A minimum of 45 dwellings will be provided.
			Development will:
			 provide a pedestrian/cycle link between Hall Road and City Road; have vehicular access from City Road;
			 convert the Victorian building in the north-east corner of the site for residential uses, as part of the comprehensive development of the site;
			 protect trees along the southern boundary and enhance the landscape setting of the site; and protect and enhance the setting of St Mark's Church and graveyard.
			Consideration should be given to retaining and converting the Victorian building in the north-east corner of the site for residential uses as part of the comprehensive development of the site, subject to viability.

REF	PAGE	POLICY / SITE	MAIN MODIFICATION
			Amend second paragraph of the explanatory text as follows:
			"Development proposals must address the site's constraints. On site constraints include trees along the southern boundary, possible contamination and the need for demolition of existing buildings. The Victorian building in the north of the site is of some conservation value has some heritage interest although it has been extensively altered and extended and consequently it is
			neither statutorily listed nor on the city council's local list. If viable, the option of retaining the building and converting it for residential purposes may be considered and should be retained and converted as part of comprehensive redevelopment of the site.
SA-MM16	201-208	R10/Deal Ground	Proposed Main Modification deleted. Retain wording of Policy R10 as submitted.
SA-MM17	209-215		17.1 Amend third bullet point of policy as follows:
			 "Provide a mix of uses to include housing, employment and power regeneration from renewable sources. The housing element should provide in the region a minimum of 100 dwellings;"
			Reason: this change is proposed in response to an objection (6566-2). A minimum figure is necessary to enable the contribution of the site to the JCS housing target to be quantified. The change also corrects a minor typo (power 'generation' rather than 'regeneration').
			17.2 Amend 8th bullet point in policy R11 to replace the term "residential moorings" with "public moorings and/or private moorings serving new residential development".
			17.3 Amend text as follows: At the end of the third paragraph of the description, delete the words "National Park" and replace with "Authority area".
			17.4 Amend text as follows: After the last paragraph of the explanatory text, add an additional paragraph: "Development needs to ensure that the water environment is protected. The site falls within Source Protection Zone 1, designated to protect water supplies, and therefore the water environment is particularly vulnerable in this location. Detailed discussions over this issue will be

REF	PAGE	POLICY / SITE	MAIN MODIFICATION
			required with the Environment Agency to ensure that proposals are appropriate for the site and that the site is developed in a manner which protects the water environment." 17.5 Amend text as follows: Add new paragraph: "A permit is required for the power generation element of the development from the Environment Agency. It is recommended that developers engage in early discussions with the Agency on this matter." 17.6 Amend text as follows: Add new paragraph: "This site lies adjacent to the River Wensum. A written consent from the Environment Agency is required for proposed works or structures, in, under, over or within 9 metres of the top of the bank of a designated 'main river'. It is recommended that developers engage in early discussions with the Environment Agency."
SA-MM18	216-221	R12/Kerrison Road / Hardy Road, Gothic Works	18.1 Amend third paragraph of policy R12, second sentence, to read: "The development will also require reservation of sufficient land within the scheme to enable emergency vehicular access for vehicles in the event of an emergency and for servicing, to be achieved from Hardy Road to the Utilities site (R11)." Also amend ninth paragraph of explanatory text for R12 on page 203 of SA5, to read: "The development will also require reservation of sufficient land within the scheme to enable emergency vehicular access for vehicles in the event of an emergency and for servicing, to be achieved from Hardy Road to the Utilities site (R11)" 18.2 Amend text as follows: Add a new paragraph before the fourth to last paragraph of the explanatory text: "This site lies adjacent to the River Wensum. A written consent from the Environment Agency is required for proposed works or structures, in, under, over or within 9 metres of the top of the bank of a designated 'main river'. It is recommended that developers engage in early discussions with the Environment Agency." 18.3 Amend text as follows: In the fourth last paragraph, add "The site is over 1 hectare in size." after " Flood Zone 3a."

REF	PAGE	POLICY / SITE	MAIN MODIFICATION
			18.4 Amend text as follows: In the explanatory text, add an additional paragraph: "Development needs to ensure that the water environment is protected. The site falls within Source Protection Zone 1, designated to protect water supplies, and therefore the water environment is particularly vulnerable in this location. Detailed discussions over this issue will be required with the Environment Agency to ensure that proposals are appropriate for the site and that the site is developed in a manner which protects the water environment."
SA-MM19	222-224	R13/233-277 Aylsham Road	19.1 Amend policy, supporting text, and site plan (see annex B for site plan). Policy change:
			Policy R13: 233261- 277 Aylsham Road The site of 1.49 1.00 hectares is allocated for housing development, to provide in the region of 75 50 dwellings. The development could also include starter employment units.
			Design of the development must mitigate the noise impact from Aylsham Road <u>and adjacent existing businesses</u> . A noise assessment will be required. Design must also create a street frontage to Aylsham Road.
			Supporting text change: Description
			The site is in the north of the city and is 1.49 hectares just under 1 hectares in size. It is currently occupied by a range of industrial units and motor sales and repair uses car rental company and convenience store.
			The site has a frontage to Aylsham Road to its west, and borders the rear gardens of housing in Palmer Road to the north-east and recent housing development at Copenhagen Way to the east.

REF	PAGE	POLICY / SITE	MAIN MODIFICATION
			A Bingo Hall and its car park is north-west of the site, beyond which is a large site allocated for comprehensive development (R23). To the south west are a number of small industrial units, used for car repairs, MOT testing, paint sprayers and other similar businesses.
			Aylsham Road is a busy radial road with a mixture of business, residential and retail uses, including a range of local services and shops in the Aylsham Road local and district centres neighbouring the site.
			Explanatory Text
			Development presents the opportunity to contribute to regeneration of the Aylsham Road area. Since this is a highly accessible location on a bus rapid transit public transport corridor, housing development should be of medium to high density to meet the requirements of Joint Core Strategy policies promoting higher density development close to local services and public transport. A mix of flats and houses would be an appropriate form of development on this site.
			Development could also include starter employment units. If such small scale business units are included, the development must be carefully designed to ensure there is no conflict between housing and business uses.
			The development should be designed both to create an attractive frontage to Aylsham Road and to minimise noise for residents from the road <u>and any potential noise from adjacent existing businesses.</u>
			Trees on the frontage should be retained if this is feasible, with the existing access from Aylsham Road being used.
			Deliverability
			The site is in multiple dual ownership. However, it is being actively promoted for development and is therefore suitable and available for development during the plan period.

REF	PAGE	POLICY / SITE	MAIN MODIFICATION
			19.2 Amend text as follows: After the above text, add "Development should also take into account possible contamination on the site."
SA-MM20	225-227	R14/Chalk Hill Works	Delete policy, supporting text and remove from policies map.
SA-MM21	228-230	R15/Gas Holder at Gas Hill	21.1 Amend final paragraph of the policy as follows: 'Design of the development must reflect its location adjacent to the Thorpe wooded ridge and must protect and enhance biodiversity and geodiversity.' 21.2 Amend text as follows: In the explanatory text, add an additional paragraph: "Development needs to ensure that the water environment is protected. The site falls within Source Protection Zone 1, designated to protect water supplies, and therefore the water environment is particularly vulnerable in this location. Detailed discussions over this issue will be required with the Environment Agency to ensure that proposals are appropriate for the site and that the site is developed in a manner which protects the water environment." 21.3 Amend text to include a reference to geodiversity so that paragraph 3 of the explanatory text reads "development must not have a negative impact on geodiversity or on views". 21.4 Add text to end of 5th paragraph in explanatory text to add: "As a minimum, protection and enhancement of geodiversity will include recording of geological features on site".
SA-MM22	231-234	R16 Land east of Bishop Bridge Road	22.1 Amend policy as follows: "POLICY R16: Land east of Bishop Bridge Road The site east of Bishop Bridge Road (1.01 hectares) is allocated for housing development. In the region of 50 dwellings will be provided. Development will not take place prior to the revocation or surrender of the hazardous substance

REF	PAGE	POLICY / SITE	MAIN MODIFICATION
			consent and <u>or</u> decommissioning of the site gas holder.
			Development proposals should provide for potential future vehicular access to allocated site R17 to the north.
			Design of the development must reflect its location adjacent to the Thorpe wooded ridge and protect and enhance biodiversity and geodiversity.
			A noise assessment is required and the development should be designed to mitigate the impact of noise from the inner ring road."
			22.2 Amend text as follows: In the explanatory text, add an additional paragraph: "Development needs to ensure that the water environment is protected throughout the development of the site. The site falls within a Source Protection Zone 1, designated to protect water supplies, and therefore the water environment is particularly vulnerable in this location. Detailed discussions over this issue will be required with the Environment Agency to ensure that proposals are appropriate for the site and that the site is developed in a manner which protects the water environment."
			22.3 Amend text to include a reference to geodiversity so that paragraph 3 of the explanatory text reads "development must not have a negative impact on geodiversity or on views "
			22.4 Amend text as follows: Change text and policy as suggested re current planning permission, decommissioning of gasholder rather than the site and development of whole site not being dependent on that decommissioning. Change second paragraph of explanatory text to read: "The site was formerly allocated in the Replacement Local Plan 2004 for housing development as two separate sites. The northern part of the site has a part implemented planning permission for 19 apartments. National Grid has put forward further extensions to the original local plan allocation to include the house at 27 Bishop Bridge Road and the gas pressure reduction station. The site is covered by the Health and Safety Executive consultation zone for the gas holder. Development of the southern part of the site will depend on the successful decommissioning of the gas holder and

REF	PAGE	POLICY / SITE	MAIN MODIFICATION
			revocation or surrender of its hazardous substance consent. Allocation of this site will help to secure comprehensive site development." 22.5 Add text to end of 5th paragraph in explanatory text to add: "As a minimum, protection and
			enhancement of geodiversity will include recording of geological features on site".
SA-MM23	235-237	R17 Land at Ketts Hill /	23.1 Amend second bullet point of policy to read:
		Bishop Bridge Rd	 "Design of the development must reflect its location adjacent to the Thorpe wooded ridge, and protect and enhance biodiversity <u>and geodiversity</u>;"
			23.2 Amend text as follows: In the explanatory text, add an additional paragraph: "Development needs to ensure that the water environment is protected. The site falls within Source Protection Zone 1, designated to protect water supplies, and therefore the water environment is particularly vulnerable in this location. Detailed discussions over this issue will be required with the Environment Agency to ensure that proposals are appropriate for the site and that the site is developed in a manner which protects the water environment."
			23.3 Amend text to include a reference to geodiversity so that paragraph 3 of the explanatory text reads "development must not have a negative impact on geodiversity or on views "
			23.4 Add text to end of 5th paragraph in explanatory text to add: <u>"As a minimum, protection and enhancement of geodiversity will include recording of geological features on site".</u>
SA-MM24	238-242	R18 124-128 Barrack Street	Amend policy, supporting text and policies map (see annex C for site plan). Policy change:
			Policy R18: Land at 124 126-128 Barrack Street
			$\frac{124}{126}$ -128 Barrack Street ($\frac{0.23}{0.1}$ hectares) is allocated for housing, or a mix of housing and community uses.

REF	PAGE	POLICY / SITE	MAIN MODIFICATION
			Pevelopment will: Reinstate a strong built frontage to Barrack Street and Anchor Close; Take vehicular access from Anchor Close and provide pedestrian links from Barrack Street and Brewers Court; Retain and convert the former public house at 124 Barrack Street for housing or other beneficial community use, or if this is demonstrated to be impractical and unviable, provide for its recording and inclusion on the Historic Environment Record in accordance with development management policy DM9A noise assessment will be required. Soundproofing measures will be provided for residential units fronting Barrack Street and those on Anchor Close closest to the inner ring road, which are adequate to mitigate against traffic noise. Ensure that the disposition and height of buildings will minimise amenity impacts on existing properties; Ensure the design takes account of any likely impacts on amenity from the proximity of the adjoining substation. Provide adequate on-site landscaped amenity space for any flats. A minimum of 30 15 dwellings will be provided if the site is redeveloped wholly for housing. In the event that the former public house is retained for an alternative use, a minimum of 15 dwellings will be provided on the eastern half of the on site. Should the consented scheme on this area of the allocation not proceed, affordable housing should be included in accordance with Joint Core Strategy policy 4. Supporting text change: Description This brownfield site of 0-23 0.1 hectares is located on the north side of Barrack Street, between Silver Road and Anchor Close. It comprises separate adjoining sites: a former 1930s pub at number 124 subsequently converted for coroner's office use, and what remains the vacant site of a motor repair and sales trade site (126-128) with frontages to Barrack Street and Anchor Close.

REF	PAGE	POLICY / SITE	MAIN MODIFICATION
			The site lies within a mixed commercial frontage along this part of Barrack Street. The former pub has planning permission for use as a dental practice and permission for a substantial extension at the rear. The former pub building has some architectural merit but is at present neither listed nor locally listed: it is however proposed for inclusion on an extended local list. The original motor trade premises on the main road frontage have recently been demolished. The site is now largely given over to open vehicle storage, servicing and display, with post war buildings in the rear part from which the taxi office operates. The motor sales site had permission for redevelopment for 15 flats, granted in April 2009. This permission has since expired.
			Much of the immediate surrounding area to the north and east is in residential use having undergone comprehensive redevelopment for housing in the 1960s and 70s, with predominantly bungalow / single storey styles. The motor sales site has permission for redevelopment for 15 flats, granted in April 2009. The land immediately to the west includes a substation and footpath to the residential neighbourhood behind.
			Barrack Street is a busy and heavily trafficked single carriageway road forming part of the Inner Ring Road (A147) defining the northern edge of the city centre. The extensive former Jarrold Printers site (CC 23 19a) on the south side of Barrack Street is undergoing phased redevelopment for offices and housing.
			Explanatory Text
			The site provides the opportunity for new housing on a brownfield site with good access to employment opportunities and services in the city centre and to neighbourhood shopping facilities within the nearby large district centre focused on Anglia Square and local centre at Bishop Bridge Road.
			The site is close to the strategic cycle network (the "pink route") defined in the Norwich Area Transport Strategy (NATS). There are opportunities to enhance and divert this route as part of the regeneration of the Jarrold Printers site, providing a pedestrian and cycle link to the city centre via the Peter's Bridge.

REF	PAGE	POLICY / SITE	MAIN MODIFICATION
			The principle of housing development on the eastern half of the site has already been established by virtue of the extant 2009 permission. The site is well related to the surrounding residential area and housing remains the most appropriate use for the whole site. should this partial scheme not proceed. There may be an opportunity to amalgamate the two sites for a more viable comprehensive scheme, (although they could be developed in isolation).
			The former Sportsman pub (dating from 1937) has been put forward for potential inclusion on the council's expanded local list of buildings of architectural and historic interest. Its inclusion would bring the building within the scope of development management policy DM9 as a locally identified heritage asset, accordingly consideration should be given to retaining it within any development scheme, either for housing or for an appropriate alternative community use if not required for a dental surgery.
			The form of development on the western half of the site should respect the character of the existing building (if retained), and the design of the development scheme as a whole should reinstate a strong frontage to Barrack Street in particular, given the site's prominent location on the inner ring road, and to Anchor Close. Vehicular and cycle access should be taken from Anchor Close , including where possible access to the rear of the former pub. Pedestrian/cycle access should be taken from the Brewers Court side of the site and Barrack Street.
			The part of the site nearest to Barrack Street falls within flood zone 2. Therefore a flood risk assessment is required for this site and appropriate mitigation measures should be provided as part of the development.
			Contamination from the existing motor trade uses is likely to be an issue and this should be addressed through site investigation and appropriate remediation: account should also be taken of the need to mitigate traffic noise from the main road to protect amenities for future residents. If development is taking place at the rear of the site adjacent to properties in Brewers Court then site layout should be arranged to ensure that these lower level properties are not adversely overshadowed or overlooked. Redevelopment at No. 124 should also have regard to minimising impacts which might arise from the proximity of the sub station site to the west.

REF	PAGE	POLICY / SITE	MAIN MODIFICATION
SA-MM25	243-246	R19/Van Dal, Dibden Road)	The site has potential for a minimum of 30 15 units of housing. However the policy is written in a flexible way to reflect the existing permissions in place on the site; it is likely that between 15 and 30 units of housing will be provided overall. The number of housing units could be optimised if some premises were 'car-free', which would be acceptable given the site's close proximity to Anglia Square and the Barrack Street redevelopment and public transport, and the ease of cycle and pedestrian access to the city centre. Deliverability The site is in two separate a single ownerships. The eastern half has and has had planning permission for 15 flats; the western half has permission for conversion and extension of the pub/office to provide a dental surgery. As of February 2012 neither scheme had been commenced. It is considered to be available for development within the plan period. Amendment of paragraph 2 of the explanatory text and the policy wording to the following policies to update reference to locally listed buildings. Explanatory text:
			The heritage significance of existing <u>locally listed</u> buildings should be recognised and assessed to consider whether they are suitable for conversion in part or as a whole. Following assessment development should involve either conversion of <u>the</u> existing <u>locally listed</u> buildings, <u>which are proposed for local listing</u> , or redevelopment if this is not practical. If redeveloping the site the heritage significance <u>of the locally listed buildings</u> should be recorded and included on the Heritage Environment Record. Some form of heritage interpretation to commemorate the former use of the site would be appropriate in redevelopment proposals. New development should be designed to integrate well with surrounding housing and to make the best of the potential for views over the city. Policy wording:

REF	PAGE	POLICY / SITE	MAIN MODIFICATION
			Policy R19: Van Dal Shoes, Dibden Road The site (0.54 hectares) is allocated for housing development. Depending on the nature of the scheme in the region of 20 to 25 dwellings will be provided on this site through conversion of existing locally listed buildings or new build.
			An assessment the heritage significance of existing buildings on-site to consider whether they are suitable for conversion in part or as a whole will be required. Development will:
			 Address access issues including the potential stopping up or diversion of the highway; Provide enhanced pedestrian and cycle links to Mousehold Avenue and Gertrude Road;
			• Be designed to promote biodiversity links between neighbouring green spaces, and to take account of existing trees on-site and the site's prominent location.
SA-MM26	251-254	R21/Sprowston Rd / land north of Windmill Rd	26.1 Amend policy, supporting text and site plan (see annex D for site plan). Policy change:
			POLICY R21 Sprowston Road/Land north of Windmill Road
			The Land at Sprowston Road/north of Windmill Road is allocated for mixed use development consisting of a retail food store and housing, in the region of 25 10 dwellings. will be provided as part of the scheme. Due to the nature of the site layout and constraints, a comprehensive scheme for the development of the site is required
			The scale of retail development should be appropriate to the needs of the area in accordance with policy DM18 and should make provision for the replacement of the existing small retail units within the site in conjunction with the development of a new retail food store.
			Development will be designed to:

REF	PAGE	POLICY / SITE	MAIN MODIFICATION
REF	PAGE	POLICY / SITE	 MAIN MODIFICATION ○ provide pedestrian access through the site to link Templemere with Windmill Road and vehicular access arrangements to serve the site as a whole by linking in to the new access provided through the development of the adjacent site for retailing; ○ ensure a high standard of amenity for residents ○ protect and/or replace on site trees and provide a landscaping scheme enhance site linkages. ○ Mitigate the impact of noise from road traffic. A noise assessment will be required." Supporting text change: Description The site is in the north of the city and is 1.02 0.18 hectares in size. While the majority of the site is vacant, there are shops on part of the Sprowston Road frontage. Windmill Road links Sprowston Road and Templemere through the site via a privately owned and unsurfaced track. The site is surrounded by housing which is a mixture of 2 storey semi- detached housing and Victorian terraces. There are 3 storey flats adjacent to the north of the site. The site is also in close proximity to the Sprowston Road/Shipfield local centre.
			Explanatory text
			The site is close to a district centre with excellent public transport links. The mixed use development to the south of Windmill Road has recently seen completion of a foodstore and works have commenced on site to provide a small number of housing units.
			The site was allocated in the 2004 Local Plan primarily for housing development. Since the site is close to a local centre with excellent public transport links, mixed use development with retailing will bring wide regeneration benefits for this area. Development of a foodstore on the adjacent site will enlarge and strengthen the local centre so that it can better meet the area's day to day needs for top-up shopping. Housing development will additionally aid regeneration and will benefit from its location close to the centre and the

REF	PAGE	POLICY / SITE	MAIN MODIFICATION
			excellent public transport links. It is possible that the retail element may need to be delivered first to enable housing development.
			Development proposals must address the site's constraints. These include demolition of existing buildings undertaking ground conditions and contamination surveys and an archaeological assessment.
			The design of the development must take account of the differing land levels within the site, its sloping nature and on site trees., as well as the presence of a sewer below the site. It must be designed to create a frontage to the main road, whilst the layout of a mixed retail and housing
			scheme should be designed to ensure that noise levels are not too high for residents from within the site or arising from road traffic noise (depending on site layout).
			Sprowston Road is part of the major road network and is a core bus route. A new access to Sprowston Road is being created as a result of the implemented permission on the adjacent site. Linking in to this new access would enable Windmill Road to be retained as an un-surfaced track offering pedestrian and cycle friendly links to Anthony Drive and Templemere. Therefore any new access to the main road must be carefully designed to minimise its impact. A single point of access from Sprowston Road to serve motorised vehicles using the site is likely to be required and, as a consequence of this, it is likely to be necessary to relocate the bus stop. This new access needs to relate positively in planning terms to the retention and re-use of Windmill Road.
			Windmill Road offers an opportunity to provide a suitably designed and landscaped pedestrian/cycle link to Templemere and this link should be provided as part of redevelopment. The layout and design of the development must ensure that pedestrian and cycle links to and within the enlarged local centre are of high quality, including links to the blue route on the Strategic Cycle Network, to local cycle routes and to Anthony Drive.
			Assessment and protection of on-site trees will be required followed by a scheme of landscaping to enhance site linkages.
			Since the site is over 1 hectare, a flood risk assessment is required and appropriate mitigation measures should be provided as part of the development.

REF	PAGE	POLICY / SITE	MAIN MODIFICATION
			Deliverability The site is being actively promoted and is suitable for development. The site is owned by several different parties in a single ownership. Negotiations are taking place between these and there is a reasonable prospect that the proposal will be delivered as a single comprehensive development.
SA-MM27	276-279	R28/Site north of Raynham Street	Amend policy R28 to ensure consistency with policy R38 and the requirement to improve the setting of the Strategic Cycle link:
			Policy R28: Site north of Raynham Street The site of 1 hectare is allocated for housing development (40 dwellings minimum), subject to the provision of an acceptable and safe access to the site. The development will be designed to: • enhance the setting of neighbouring green spaces and paths, including integrating the Dolphin Path into its design to improve the setting of the strategic pedestrian/cycle route and make it a more attractive link • mitigate the impact of noise for future residents from the existing employment area; • respect the setting of the neighbouring listed buildings; • protect trees on or near the site, including preserved trees; • enhance biodiversity.
SA-MM28	286-289	R31/ Hurricane Way	Amend first paragraph of the policy as follows: "Two sites at Hurricane Way (as identified on the proposals map as site A and site B) are allocated for light industrial development and/or for small business uses. Housing development will be acceptable on the southern part of site B in accordance with an agreed Masterplan. These uses must not be significantly detrimental to the amenity of adjoining neighbouring residential occupiers. A noise assessment will be required."

REF	PAGE	POLICY / SITE	MAIN MODIFICATION
			Amend supporting text by adding a new sentence to the end of the fifth paragraph as follows: "Both the design and use of the sites must avoid any potential noise and amenity conflicts with housing to the south and south-west of the sites. Therefore light industrial and small business uses are promoted and landscaped buffers must be provided to existing residential development. Dependent on production of a Masterplan, residential development may be suitable on the southern part of site B. Whilst the scale of development will be determined by the Masterplan, for the purposes of calculating the SAP's contribution to the JCS housing requirement an assumption has been made that the site will deliver in the region of 30 dwellings."
SA-MM29	290-295	R32/The Paddocks, Holt Road	Amend the supporting text and policy as follows: R32: The Paddocks, Holt Road Description This 4.57 hectare site comprises an area of open land situated between the airport operational area and the A140 Holt Road. Much of the site is grazing land but part toward its southern end has been in low-key sporadic use in recent years for storage of materials and commercial vehicle parking. There is low density housing along the road frontage on the opposite side of Holt Road, in Broadland district, to the west and airport operational buildings on Gambling Close to the east. The site is partly screened by a line of hedge/trees fronting Holt Road. Explanatory text
			This site is allocated identified as suitable for airport operational uses as the further development of Norwich Airport, important to economic development locally, is supported by the Joint Core Strategy. However, it is also potentially suitable to meet more general employment needs which may be airport related. This is supported by policy 5 of the JCS and the recent designation of Norwich International Airport as a focus for growth and investment as part of the Greater Norwich City Deal.

REF	PAGE	POLICY / SITE	MAIN MODIFICATION
			The government requires strongly recommends licensed airports to set out their future development proposals by preparing a masterplan. Consequently, it is expected that The expectation of the city council for many years has been that the need for this site for operational uses to enable further airport expansion will would be investigated fully through the preparation of a masterplan, which will would be produced by the airport. The airport company have confirmed their intention to commence work on a masterplan in 2015.
			The major Norwich Aeropark development to the north-east (approved in 2013) is expected to accommodate a substantial amount of future operational development within the airport boundary, although the airport have not confirmed whether additional land will be required for this purpose. Equally, it would not be appropriate to delay beneficial development of the Paddocks site unreasonably if the preparation of a masterplan were delayed for any reason.
			Consequently the policy provides for two eventualities: development for airport operational purposes if a masterplan shows that the site is necessary for this, or development for general needs employment use if not. Should no masterplan be agreed within two years of the adoption of this plan, the policy allows for the release of the site for general employment purposes, subject to meeting specified access and design criteria.
			The masterplan should incorporate a surface access strategy for the airport as a whole and this should include a comprehensive travel plan for the existing operations on site.
			In advance of a masterplan development proposals which come forward for this site (as for other sites within the airport boundary) would need to be accompanied by an assessment clearly setting out the relationship of the proposed development with the overall strategy for the airport in the context of future airport growth and development needs.
			The anticipated development of the Aeropark and the proximity of a major junction with the proposed Norwich Northern Distributor Road (NDR) mean that traffic flows on the A140 are likely to remain high for the foreseeable future. Standing advice from Norfolk County Council as local highway authority is that a vehicular access direct from the A140 and additional turning

REF	PAGE	POLICY / SITE	MAIN MODIFICATION
			movements into and out of the site cannot be achieved without disrupting the free flow of traffic on the local highway network and potentially compromising its effectiveness as a bus rapid transport corridor. For highway safety reasons, therefore, the preferred access to the site must be is from Gambling Close rather than directly from Holt Road unless it can be demonstrated that direct access can be achieved without unacceptable transportation consequences. The development's design and uses must take account of the need to protect the amenity of the residents of the housing on the opposite side of Holt Road. A noise impact assessment is likely to be required for any operational uses proposed. Development on this land will require additional screening with landscape features to site boundaries facing towards Holt Road.
			As the site is more than 1 hectare in size, a flood risk assessment is required.
			Deliverability
			The site is suitable and available for development within the plan period.
			The owner of the site proposed it for an a general needs employment allocation. This is considered to be acceptable in principle but is subject to resolution of access constraints and confirmation that the site is not required for airport operational purposes. Given the potential strategic importance of the site for the expansion of airport operational needs and the availability of alternative employment sites locally, the site is allocated for airport uses, subject to masterplanning.
			Policy R32: The Paddocks, Holt Road – Airport extension or development for general employment purposes
			 The Paddocks, Holt Road, is allocated for either: airport operational uses, where an Airport Masterplan endorsed by the city council within two years from the adoption of this plan demonstrates that the land is required for

REF	PAGE	POLICY / SITE	MAIN MODIFICATION
			Airport operational purposes during the plan period. subject to the need for this land for operational purposes to enable the further expansion of the airport being investigated, and adequately demonstrated, through the development of a masterplan (or equivalent) for the airport, including a surface access strategy and Travel Plan. or,
			development for general employment purposes (use classes B1, B2 and B8) where: a) the agreed Airport masterplan referred to above demonstrates that the land will not be
			required for Airport operational purposes during the plan period, or b) no masterplan for the Airport has been endorsed by the city council within two years from the date of adoption of this plan.
			Proposals for development in advance of the masterplan should be accompanied by an assessment clearly setting out the relationship of the proposed development with the overall strategy for the airport in the context of future airport growth and development needs.
			Development for purposes unrelated to airport operations will only be accepted where the masterplan demonstrates conclusively that the land will not be required for operational purposes during the plan period.
			 In all cases, development Development will: Provide vehicular access to the site only from Gambling Close, <u>unless it can be</u> demonstrated that satisfactory direct access from Holt Road can be achieved without <u>unacceptable impacts on highway safety or the free flow of traffic;</u> Provide appropriately for servicing, parking and other transportation requirements in accordance with the airport masterplan, surface access strategy and agreed travel plan, taking account of the need to promote sustainable transport in accordance with DM policy DM28;
			 Demonstrate (through a noise impact assessment) that appropriate account has been taken of the potential impacts of noise from existing and proposed airport operations and noise generation from the development itself, in accordance with DM policy DM11;

REF	PAGE	POLICY / SITE	MAIN MODIFICATION
			 Incorporate suitable boundary treatment, screening to the Holt Road frontage and mitigation measures to reduce the impact of the development on the outlook and living conditions of adjoining and nearby residents, in accordance with DM policies DM2 and DM3.
SA-MM30	323-326	R42/Earlham Hall	30.1 Amend second and third bullet points of policy as follows:
			 "provide high quality, environmentally sensitive new buildings (maximum-approximately 7,000 square metres) in the former nursery garden and redundant glasshouse area for office, research and development and educational uses; provide an exemplary low carbon building (maximum-approximately 3,000 square metres) for office, research and development and educational uses on the former depot;" 30.2 Amend text as follows: After the third last paragraph of explanatory test, add "Since the site is over 1 hectare, a flood risk assessment is required and appropriate mitigation measures should be provided as part of the development."
SA-MM31	327-330	R43/Former Blackdale	Amend last bullet point in the policy, and add a final paragraph as follows:
		School, UEA	"be linked to the university district heating network where possible. Development of this site should be guided by a coherent and coordinated planning approach that has involved English Heritage, UEA and Norwich City Council. Lasdun's original vision should be a key consideration."
SA-MM32	331-334	R44/Land between Suffolk Walk and	Amend last bullet point in the policy, and add a final paragraph as follows:
		Bluebell Road, UEA	"be linked to the university district heating network <u>where possible</u> .
			Development of this site should be guided by a coherent and co-ordinated planning approach that has involved English Heritage, UEA and Norwich City Council. Lasdun's original vision should be a key consideration."

REF	PAGE	POLICY / SITE	MAIN MODIFICATION
SA-MM33	335-339	R45/land west of Bluebell Road, Bartram Mowers Limited	R45 Land west of Bluebell Road, Bartram Mowers Limited Description
			The 5.5 hectare site is proposed for housing for the over 55s including retirement housing and may include assisted living and/or extra care housing. This site is the area within the solid red line on the map below and shown on the Policies Map. The site is mainly brownfield, being currently occupied by Bartram Mowers' garden machinery, sales and repair business, along with a single storey building used as a nursery school, parking areas and hard standings for former greenhouses, as it was previously used for market gardening.
			Bartram Mowers ownership extends to 23 hectares between Bluebell Road and the River Yare. The remainder of the Bartram Mowers owned land is shown for information as the area within the red dotted line on the site plan below, though only the site allocation itself is shown on the Policies Map.
			Bluebell Road is to the north-east, with low density housing on the northern side, directly opposite the site. There are four dwellings south-west of Bluebell Road directly neighbouring the development site.
			Adjoining land in the Yare Valley is undeveloped, consisting of grazed fields of undulating topography to the north and fen adjacent to the River Yare to the west.
			There are a number of well-defined hedges, tree belts and groups of trees across the site, with a large tree belt with many mature trees adjacent to the A11 Newmarket Road dual carriageway to the south of the site.
			A footpath runs west from Bluebell Road to the north of the site linking to the Yare Valley Walk

REF	PAGE	POLICY / SITE	MAIN MODIFICATION
			which follows the river. There is currently no public access to the remainder of the Bartram Mowers owned land.
			Explanatory Text
			Site R45 has been allocated for housing for the over 55s. This may include assisted living and/or extra care housing. This form of housing meets a local and city wide need. Eaton has a significantly higher proportion of elderly residents than other parts of the city and there is an identified shortage of such housing in Norwich. In addition, such housing will have a reduced transport impact on the area at peak times.
			The site is on the slopes of the Yare Valley which is identified under JCS policy 1 as a key green infrastructure corridor, providing both public access to the river and countryside along the Yare Valley Walk and important wildlife habitats. Open space neighbouring the site is protected from development as part of the Yare valley under policy DM6 and as open space under policy DM8.
			Therefore it is essential that development is sensitively designed to minimise effects on important views to and within the Yare Valley. Consequently the type, scale, density and design of housing development will be determined by a Masterplan which will assess how the development can best be designed to minimise impact on the landscape and preserve the character of the area. The Masterplan must also ensure that development will complement the site's role as a gateway to the city given its close proximity to the A11 and will cover the layout of the open space.
			Whilst the scale of development on the site will be determined by the Masterplan, for the purposes of calculating the Site Allocations Plan's contribution theto Joint Core Strategy housing requirement an assumption has been made that the site will deliver in the region of 120 dwellings. This figure is based on an assumption that the sites will be developed mainly at low densities to ensure that impact on the landscape is minimised.

REF	PAGE	POLICY / SITE	MAIN MODIFICATION
			The remainder of the site within Bartram Mowers' ownership, excluding the County Wildlife Site in the fen area, is proposed to become publically accessible open space, with improved pedestrian and cycle access and improvements to the Yare Valley Walk. Development proposals for the allocated site will include the provision of a new footpath from Bluebell Road to the River Yare close to the A11 Newmarket Road embankment and tree belt. Development must minimise impact on the fens to the west. This area forms an important habitat, consisting of fen vegetation, grazing marshes, drainage dykes, alder and willow. Bartram Mowers have recently entered into a ten year Management Agreement with Natural England for the whole of their site (17.5 hectares) not proposed for development. To protect wildlife, no additional public access should be created to the fen area apart from the new footpath close to the A11. A Management Plan for the open space will be provided. Arrangements for the management and future maintenance of the public open space and the protected lines of view across the site in perpetuity will be the subject of a legal agreement with the Council. Both the development Masterplan and the Management Plan will be produced by the developers in consultation with the Council. The brief for this work will be produced by the Council. The plans will be informed by a full landscape assessment, a visual impact assessment, topographical and levels surveys and an ecological survey. The existing road access onto Bluebell Road should be used to serve the development, with an additional access to the east if necessary. Deliverability The allocated site is being promoted by its owner and is suitable and available for development within the plan period.

REF	PAGE	POLICY / SITE	MAIN MODIFICATION
			Policy R45 Land west of Bluebell Road, Bartram Mowers Limited The site of 5.5 hectares is allocated for development of a housing scheme for the over 55s, which may include assisted-living and/or extra care housing. The development will be designed to:
			 minimise impact on the landscape of the Yare Valley and important views; improve the strategic Yare Valley green infrastructure corridor, providing 17.5 hectares of public open space on land adjoining the site shown on the site plan below with a red dotted line. The public open space will provide improved pedestrian/cycle access to and within the valley, including improvements to the Yare Valley Walk. A Management Plan will be produced for the open space by the developer. A legal agreement will cover arrangements for the future management and maintenance of the open space in perpetuity; protect and enhance environmental assets within and adjacent to the site, including retaining tree belts.
			In order to ensure that the setting and character of the site are respected and to minimise impact on the landscape and important views, proposals will accord with an agreed Masterplan produced by the developer following a brief set by the Council, covering the development site and adjacent open space. The Masterplan will identify the precise areas within which development will be located, maximum building heights, the number and type of dwellings and the layout of the open space. The Masterplan and the Management Plan for the open space will be informed by: • a full landscape assessment; • a visual impact assessment;

REF	PAGE	POLICY / SITE	MAIN MODIFICATION
			 topographical and levels surveys; an ecological survey.
SA-MM34	340-342	R46/Land at Pointers Field	Delete policy, supporting text and remove from policies map.
SA-MM35	367-385	Addition of monitoring framework at Appendix 3	Inclusion of submitted document SD14 at appendix 3 of the site allocations and site specific policies plan detailing the monitoring framework applicable to both this plan and the emerging Development Management Policies Plan. Amendment to the introductory paragraph to the monitoring framework to include reference to need to review if issues with policy implementation arise: This appendix sets out the monitoring framework for the plan through the Annual Monitoring Report (AMR). Should any issues with implementation of these policies become evident through monitoring within 2 years of adoption of this plan then we will action either through seeking new evidence, implementing focused changes to this plan, or, by commencing work towards implementing a new plan. Currently, an AMR for the Joint Core Strategy is produced annually with GNDP partners, with an appendix for Norwich covering issues specific to Norwich Local Plan as set out below. See Annex 1 of this document.
SA-MM36	3386-	Addition of glossary of	35.1 Inclusion of submitted document SD15 at appendix 4 of the site allocations and site specific

REF	PAGE	POLICY / SITE	MAIN MODIFICATION
	406	terms at Appendix 4	policies plan detailing the monitoring framework applicable to both this plan and the emerging Development Management Policies Plan. See Annex 2 of this document. 35.2 Addition of the following definition in the glossary: Office Floorspace: a. Small and Medium Scale: Premises for small and medium scale businesses means premises which provide a net floorspace of less than 1,500sqm. b. Large Scale: Premises for large scale businesses means premises which provide a net floorspace of more than 1,500sqm.
			35.3 Addition of the following definition in the glossary:
			<u>Landmark Building</u> : A building or structure that stands out from its background by virtue of height, size or some other aspect of design.

For the main modifications to the policies map accompanying these main modifications please see: Appendix 2, the section entitled 'Proposed main modifications to Regulation 19 Policies map'.

Due to the size of the annexes to the policies map it has been unable to append them. To view the annexes associated with the proposed main modifications to the Regulation 19 Policies map please see the website at:

http://www.norwich.gov.uk/Planning/Documents/InspectorsReportAppendix2AnnexesOct2014.pdf

A number of hard copies will be able to view at the meeting.