

Broxtowe Borough, Gedling Borough and Nottingham City Aligned Core Strategies: Publication Version June 2012

Summary of Consultation Responses

Please note changes are proposed to address many of the issues raised during consultation, and can be found in the Schedule of Proposed Changes (February 2013). More detail of representations made and the officers responses to consultation points can be found in the Statement of Consultation (Regulation 22), February 2013, part 2, available from Constitutional Services and at www.nottinghamcity.gov.uk/corestrategysubmission.

General Comments, Section 1, Section 2 and Key Diagram

The priority given to brownfield sites was an issue which resulted in a large number of comments. Some consultees wanted to include a 'phasing policy' which would give priority to brownfield sites, to assist the regeneration of brownfield sites prior to greenfield or Green Belt sites being released.

Several consultees considered that there was a failure to cooperate fully as there is a shortfall against the Regional Strategy housing figures as a result of Rushcliffe Borough Council proposing lower housing figures. Whilst there was some support for the principle of alignment, some consultees noted that only three of the original six authorities were now fully aligned. One consultee identified that there should be a commitment to an early review of the Aligned Core Strategies. The Home Builders Federation requested that the years covered by the plan should be clearer.

Consultees also considered that the Vision should include reference to promoting sport, enhancing the natural environment, and better reference of health issues. English Heritage identified that there should be improved reference to the historic environment and to non-designated heritage assets. There was concern from the University of Nottingham that there is no reference to the benefits of student areas or acknowledge the importance of the two universities to the plan area. Some consultees felt there was little strategic vision provided beyond the plan period.

Two consultees considered the approach to minerals development and the City Council's role as a Minerals Planning Authority was inadequately covered.

Policy 1: Climate Change

The Home Builders Federation and a number of developers were concerned that the requirements of the Policy had not been tested for viability as required by the NPPF. It was recommended that an assessment of the cumulative impact of planning requirements, both local and national, should be carried out by the local planning authorities as the burden of proof should not rest with developers.

A number of consultees considered the policy to be vague and imprecise as it does not indicate what constitutes "high levels of sustainability". Consultees also questioned the need for the policy given that Building Regulations will require all homes to be built to 'zero carbon' standards from 2016 onwards, although there was

some support for homes built before 2016 to be built to this standard. One consultee also felt that some parts of the policy were vague and arbitrary.

One specific element which resulted in a number of responses was the requirement in Policy 1.2a for planned water use to be no more than 105 litres per person per day. While this was supported by some consultees, including the Environment Agency who wished to see reference to non-residential development, it was opposed by a number of developers who considered that the requirement was unenforceable, did not comply with the NPPF and was not shown to be viable.

Consultees, including Friends of the Earth (Nottingham) identified that specific references should be made to how the policies will reduce carbon emissions and contribute to the target for renewable energy generation. Responses also requested that targets for individual Districts be included and a more coherent and forceful commitment to developments in this area adopted. However, one consultee considered that paragraph 96 of the NPPF made local targets, especially those in Policy 1.1 superfluous. Others identified that paragraph 3.1.11 should be amended to support additional forms of renewable energy including wind, solar, biomass, bio fuels and anaerobic digestion.

Flooding was another issue which generated a number of responses. Whilst there was general support for the approach, consultees suggested a number of changes. These were:

- removal of “within the urban area” from Policy 1.8 as sites outside the urban area should also comply with the exception test;
- changes to Policy 1.10 to ensure that surface water is not discharged into the foul sewers;
- Amendments to the latter part of Paragraph 3.1.14 regarding surface water run-off; and
- Monitoring of the proportion of new developments that incorporate SUDs.

Policy 2: The Spatial Strategy

There was some support for the strategy of ‘urban concentration with regeneration’ and the distribution of housing between the authorities. Derbyshire County Council noted the consistency with the Erewash Core Strategy and supported the approach to housing numbers. A developer noted the fundamental difference in strategy between the Aligned Core Strategies and Rushcliffe Borough Council which has taken a ‘rural dispersal’ approach.

A number of consultees supported the overall level of housing but objected to the distribution between the authorities.

A limited number of responses were made on sites within the City Council area, including some objecting to development at Stanton Tip, but there was general support for development on other sites (such as the Waterside Regeneration Zone). A large number of the responses concerned sites in surrounding Districts, in particular Clifton Pastures, which is identified in the Rushcliffe Core Strategy. Many representatives expressed the need for the City to meet its own housing needs within its area.

Developers, on the other hand, focussed on the viability and deliverability of sites, especially brownfield land and the sites which are to be rolled forward from previous development plans.

A high proportion of members of the public and local community groups considered that there was no justification, in terms of evidence of need or environmentally, for the housing target chosen. They considered that it was too high and should be reduced. This was due, in part, to the forthcoming revocation of Regional Strategies and the introduction of the concept of 'localism'. A number also identified that the Councils' evidence base had not taken account of the collapse of the funding mechanisms for Affordable Housing.

A number of the consultees considered that the target was not realistic given past rates of delivery, and that insufficient account had been taken of the possibility of bringing empty homes back into use and the contribution 'windfall' sites can make to achieving the housing target. There was also concern that sites of less than 500 homes, which are capable of delivering a significant contribution to the overall supply, had not been included.

In contrast, developers generally considered the housing target too low and argued that it should be increased and also take account of longer term need. The use of the 2008 Household Projections as a basis was supported by a number of developers, while one proposed the 'Chelmer Model' as the appropriate way. The use of either of these approaches would result in a housing figure of roughly between 70,000 and 75,000. A buffer of either 5% or 20% should also be applied in accordance with the NPPF. One developer identified that the track record of cumulative under delivery of housing had resulted in unsustainable patterns of growth with a high degree of in-commuting and development 'leap-frogging' the Green Belt. The affordability issues in the plan area were also seen by developers as further evidence of need.

The Home Builders Federation and developers suggested that there is no evidence to suggest that a target of between 70,000 and 75,000 figure is unrealistic and this can be delivered if suitable sites are allocated. Obstacles, such as viability, should not be seen as a barrier to delivery nor used as reasons to reduce the housing target.

The Home Builders Federation also criticised the process of selecting the housing target. They considered it "back to front" and that the evidence had been prepared to fit a target selected for political and administrative reasons. Assumptions made through the preparation of the evidence regarding the level of students and in-migration were criticised as not being justified.

Developers also objected to the 'phasing' of housing as set out in Policy 2.3 and the associated table. They considered that this was not in accordance with NPPF and would not deliver a five year land supply. Weighting delivery towards the middle and back end of the plan period would not allow sufficient time for a response to any under delivery.

The Duty-to-Cooperate was raised as an issue by several consultees. Developers argued that there was a failure to consider or address the shortfall in housing caused

by Rushcliffe Borough Council. Rushcliffe Borough Council requested that the decision not allocate sites assessed in the Sustainable Urban Extensions Study as suitable should be revisited as this would address the shortfall.

With regard to the employment and retail elements of the policy the following comments were made:

- The reference to “significant new employment development” is vague and lacks precision. A floor space threshold should be set to define this;
- Policy 2 should acknowledge that land will be required for employment purposes in locations other than those identified;
- A consistent approach is needed and employment land will need to be release for other purposes.
- Reference should be made in Policy 2.5 to new retail development of an appropriate scale at the key settlements for growth;
- New retail could help in meeting existing deficiencies

Policy 3: The Green Belt

A number of consultees supported the approach in the Policy, specifically the need to recast Green Belt boundaries to accommodate future growth. Others wanted this to go further and to identify the broad locations/ specific sites where revisions will take place. On the other hand one consultee objected to the revision of Green Belt boundaries to accommodate strategic sites while other boundaries are to be revised through later Development Plan Documents. They considered that the Aligned Core Strategy should only deal with the broad locations.

A key issue identified by many consultees is the approach taken to the review of the Green Belt. Many considered that the Aligned Core Strategy is flawed as it fails to undertake a comprehensive Green Belt review and does not provide information on timetables or which boundaries will be reviewed. Consultees felt that use of the 2006 Green Belt review to inform the preparation of the Regional Plan is inadequate.

There was also a degree of opposition from members of the public and local community groups to the principle of release of land from the Green Belt, and it was considered that there was insufficient evidence that Green Belt land needed to be developed.

Policy 4: Employment Provision and Economic Development

A number of consultees identified issues regarding the supply of office space and employment land. One consultee considered that the five year supply of office space should be assessed in the same way as that for housing land (i.e. on a district by district basis with other non-allocated protected sites being granted planning permission for office use if they comply with other policy requirements). Another consultee identified that the number of houses which would be delivered was below the level required to continue job growth.

There were also concerns that criterion were needed to assess when poor quality employment sites could be released for housing. The consultee identified that no protection was needed for locally valuable sites and that the definition of ‘good employment land’ should include:

- Well located for access to the motorway;

- Have good public transport links;
- Have a critical mass of land and premises;
- Well located to a large workforce; and
- Free from operational constraints.

Whilst economic development associated with the Universities was supported, it was felt to be inadequately addressed. Whilst the broad quantum of office and industrial and warehousing development across the plan area was supported by one consultee, they felt there was no justification for the figures to be expressed as minimums.

Policy 5: Nottingham City Centre

Capital Shopping Centres (owners of the Victoria Centre and Broadmarsh Centre) support the intention to promote City Centre as the region's principal shopping, leisure and cultural destination and the removal of floorspace thresholds from previous draft of policy. Safeguarding Primary Shopping Frontages as the focus for City Centre retail development was supported by Capital Shopping Centres, but they consider that more specific references to the role these frontages play in reinforcing north-south and east-west shopping patterns and also linking the main retail destinations within the City are needed.

Capital Shopping Centres also consider that:

- Broadmarsh and Victoria Centre schemes are both required to deliver sustainable economic growth in the City Centre. The Aligned Core Strategy should allow these to come forward as the market dictates;
- the Greater Nottingham Retail Study (GNRS) is out of date and that the Victoria and Broadmarsh centres are likely to absorb comparison retail capacity within the City for foreseeable future, i.e. up to and beyond 2021;
- sufficient deliverable retail development opportunities have been identified in the City Centre to meet foreseeable needs, and there is no need to identify further opportunities within edge or out of centre locations; and
- reference to edge of centre sites is not appropriate, as these are only preferable where no sequentially preferable in centre sites are available, and there is no impact on vitality and viability.

Shell Pensions Trust (owners of the Exchange Arcade), although happy with much of this policy, consider there should be more flexible in relation to uses within Primary Shopping Frontages. They question whether the policy should require the creation of "suitable living conditions" for residents of the City Centre.

English Heritage welcomed the aspiration in 5.1e to improve access between key historic and cultural assets, which should be based on a thorough understanding using old maps and other sources. English Heritage also welcomed reference to the historic environment in 5.1.g, but considered this needs to reflect the wider importance of the historic environment to the City Centre.

Policy 6: Role of Town and Local Centres

References in Policy 6 to the sequential test and impact assessment produced a number of responses. Consultees were concerned that references to the sequential assessment did not accord with the NPPF and should acknowledge that new retail

proposals should include assessment of the ability to provide more choice and competition and that in centre, edge of centre and out of centre locations are all preferences in the NPPF. In relation to the impact assessment consultees noted that these should only measure impact against centres of commensurate scale and function to the proposed development and should only be requested for developments above 2,500 sq metres unless a locally set threshold has been set in a Development Plan Documents. However, one consultee objected to the provision in Policy 6.6 to consider locally set thresholds as there is no justification and the threshold would be difficult to set.

Whilst the approach in Policy 6 towards retail as part of 'major residential led development' was supported by one consultee, the policy resulted in a number of responses. Another consultee identified that the new centres which will result from the areas of significant growth should be included in the hierarchy of centres identified in Policy 6.1.

One consultee identified that Policy 6.2 should be amended to include reference to Development Plan Documents identifying primary shopping areas and, where necessary, secondary shopping areas as well as boundaries.

A number of consultees identified that future updates will be required to the Greater Nottingham Retail Study (2007) to inform subsequent development plan documents and to provide more detail on overtrading, leakage and the ability to clawback.

Other issues raised include:

- Policy 6 (edge of and out of centre development) should apply to all main town centre uses, not just retail and leisure.
- A local threshold for impact assessments of 1,000 sq m should apply.
- Bobbers Mill employment site should be allocated as a Local Centre.

Policy 7: Regeneration

There was limited comment on this policy. Issues raised include:

- Policy 7 needs to allow for the early delivery of the bus depot on London Road.
- Canal and River Trust supports the inclusion of the Waterside Regeneration Zone.

Policy 8: Housing Size, Mix and Choice

Whilst there was support for the use of Strategic Housing Market Assessments (SHMAs) consultees considered that the SHMA prepared for the Core Strategy is out of date and in need of updating.

Viability was a key concern of many responses on Policy 8. A number of developers considered that evidence of the viability of the Affordable Housing requirements was either not provided or out of date. The Home Builders Federation and developers also considered that the onus should be on the local planning authority to demonstrate viability through a cumulative assessment rather than developers to challenge the requirements on a site-by-site basis and that decisions which affect viability should not be left to later planning documents.

The proposal in Policy 8.7 to relook at affordable housing requirements for large sites was considered inappropriate and the mechanism should be identified in the ACS.

There was support for the use of local variations of the affordable housing figures given that viability is different in different parts of the plan area. It was also identified that the need for affordable housing should be considered based on the need in local areas, such as villages, rather than looking exclusively at viability.

Another issue which resulted in a number of comments was the design and type of Affordable Housing. One consultee considered that affordable housing should be appropriately designed for its context and should include provision for people who wish to downsize. Another consultee identified that the reference in Policy 8.1 to 'Lifetime Homes' was vague and not in accordance with paragraph 96 of the NPPF.

Both the University of Nottingham and the Residential Landlords Association raised concerns over the approach to housing mix in areas of concentration of student households.

Policy 9: Gypsies, Travellers and Travelling Showpeople

While there was support for elements of this policy, notably 9.3a and 9.3e, two developers identified that the inclusion of Gypsy and Traveller sites as part of Sustainable Urban Extensions may not be deliverable due to viability issues and landowner reluctance.

Policy 10: Design and Enhancing Local Identity

Elements of the Policy which were supported included Policy 10.1c on 'garden grabbing' and paragraphs 3.10.2 and 3.10.3 on the use of local evidence and the importance of heritage to local distinctiveness. However, one consultee noted that protection of the historic environment may not always be compatible with adapting to climate change and promoting safer living environments.

Both Nottinghamshire County Council and the Coal Authority raised issues regarding contamination and land stability. The Coal Authority recommended that the Aligned Core Strategy reflect the NPPF and PPG14 by addressing potential safety issues and the history of coal mining in the plan area.

The approach to local design standards was criticised by the Home Builders Federation who considered it unsound to leave matters of detailed guidance to later documents. They argued that precise local standards should be included in the Aligned Core Strategy and subjected to viability assessment. In terms of specific standards, one consultee requested that a policy for lighting and light pollution be included while another wanted paragraph 3.10.5 to include clarification that 'Buildings for Life' is only one potential approach to determining design quality.

Policy 11: The Historic Environment

Whilst there was support for the policy and monitoring arrangements from English Heritage a number of consultees considered that the Aligned Core Strategy made no provision for retaining the settings and safeguarding existing heritage assets and historical monuments.

Both English Heritage and Nottinghamshire County Council made a number of suggestions to strengthen the policy or clarify certain elements.

Policy 12: Local Services and Healthy Lifestyles

Policy 12.1 was generally supported. One consultee identified that new or improved community facilities should only be required as part of major new residential development where there is evidence of need.

Policy 13: Culture, Tourism and Sport

There was general support from Sport England and the Theatres Trust for this Policy for this policy especially in relation to sports and theatres, although one consultee identified that there are areas where sports facilities and associated development should be restricted, and Sport England identified that the 2009 Open Space Audit and Playing Pitch Strategy are almost three years old. Normally such evidence would be considered out of date, if the document has not been updated in the three year period.

Policy 14: Managing Travel Demand

The Highways Agency (HA) and Nottinghamshire County Council point out the necessary transport modelling required to identify packages of measures has yet to be concluded. The HA consider that without this work being concluded there is uncertainty over the sufficiency of committed transport measures on their own to accommodate the cumulative impacts arising from the development proposals in the plan area and adjoining districts. Consequently further additional transport infrastructure, including strategic road network (SRN) infrastructure, as yet undetermined may be required which may need to be funded through CIL.

The HA identify the following further issues-

- The Strategic Road Network within the plan area is already under pressure;
- They do not consider that peak period problems can be addressed through simply increasing road capacity but would seek an approach to encourage use of sustainable modes whilst identifying development pressures which give rise to traffic impacts which need to be addressed through road improvements;
- They fully support measures to reduce reliance on the car via development in accessible locations and provision of sustainable transport measures;
- They support the hierarchical approach to ensuring the delivery of sustainable urban extensions and that highway capacity enhancements will be necessary to deal with residual car demand;
- SRN infrastructure may be required in the form of junction modification and/or traffic management schemes for key M1 and A52 junctions; and
- Policy 14 could be modified to better reflect the significance of the Strategic Road Network.

Policy 15: Transport Infrastructure Priorities

Nottinghamshire County Council notes the reliance on the Infrastructure Delivery Plan as the evidence base detailing the additional transport infrastructure needed to support new development and point out that the IDP does not provide the necessary detail at this point in time, since the transport modelling is still work in progress. They

have concerns that Policy 15 (3) does not establish the additional transport infrastructure required to support the ACS spatial strategy in Policy 2.

The Highways Agency supports partnership working with infrastructure providers as set out in the plan and considers that the existing planned transport schemes listed under Policy 15 will provide a significant contribution to transport networks and enhance their ability to meet further pressures arising from proposed growth. With regard to the A453 widening, the agency confirms that the Government has announced that this is planned to commence in the fourth quarter of 2012/13.

A community group from Broxtowe were concerned that the listed schemes are outside of Broxtowe and that no consideration had been given to public transport infrastructure to cover cross/inter borough transport services. A developer considered there was no mention of improvements to bus services or the provision of additional park and ride services.

Policy 16: Green Infrastructure, Parks and Open Space

There was general support for the Policy, the provision of Green Infrastructure and particularly references to:

- The historic environment;
- The protection and enhancement of the natural environment;
- The use of landscape character assessments;
- Allowing the migration of species; and
- Making provision for biodiversity.

There were concerns from both Sport England and English Heritage regarding the approach in Policy 16.4 to the potential development of open space that is “underused or undervalued”. This should not be the overriding factor in the loss of the open space and that the assessment of whether it is “underused or undervalued” may not fully address potential historic qualities.

There was also a concern from Nottinghamshire Wildlife Trust regarding the reference in paragraph 3.16.3 to the potential for energy production within Green Infrastructure corridors. They identified that hydro power and wind turbines are “very damaging” to biodiversity interests. Stapleford & Trowell Rural Action Group raised concerns regarding the inconsistencies between the approach to Green Infrastructure and the approach to the Green Belt.

A number of additions were sought to the policy. These included:

- Reference to Landscape & Visual Impact Assessments;
- The involvement of local communities in planning for Green Infrastructure;
- The protection of agriculture from urbanisation;
- Reference to the provision of open space as part of new developments;
- The maintenance and enhancement of water courses as Green Infrastructure; and
- Clarification that only strategic allocations would be required to contribute to the strategic Green Infrastructure network.

In terms of monitoring, consultees requested that the quality of open space be monitored by whether there was a management plan in place as this would cover

sites other than council managed parks and open space. The use of Natural England's Accessible Greenspace Targets for monitoring the accessibility of Green Infrastructure was also supported.

Policy 17: Biodiversity

Elements of the policy that were supported included:

- The commitment to increase levels of biodiversity;
- The precautionary approach to the prospective Special Protection Area (see also comments made on the Habitats Regulations Assessment); and
- The support for maintaining and enhancing biodiversity.

A number of consultees, mainly developers, sought changes to amend elements they saw as overly restrictive or beyond the intention in the NPPF. These included the approach to non-designated sites and the requirement for the consideration of alternative locations. A review of all national and local designation and the removal of local designations from the Plan were also requested.

Questions were raised regarding the sequential approach and the approach to the hierarchy of sites. There were concerns that mitigation and compensation were seen as equivalent where in fact compensation should be seen as a last resort. Nottinghamshire Wildlife Trust considered that the 'Sites of Importance to Nature Conservation' (SINC) designation was devalued by giving more protection to national and international sites. This consultee also questioned how the designation of further sites was to be pursued given the level of resources available.

A number of changes were sought to strengthen the policy. These included:

- The protection of hedgerow and established trees;
- Consideration of the ecological value of brownfield sites including those allocated for development;
- Recognition that the fragmentation of habitats should generally be avoided not just "wherever possible" as stated at Policy 17.1b;
- Addition of 'minimising impacts on biodiversity' to Policy 17.1;
- Amendments at Policy 17.1a and paragraph 3.17.5 to bring the text in line with paragraph 117 of the NPPF;
- A link should be provided in the text to Natural England and local advice; and
- Reference to biodiversity at a landscape scale.

Policy 18: Infrastructure and Policy 19: Developer Contributions

Note: These policies are addressed together as there are strong links between the two and similar issues have been raised on both.

A key concern of developers was the need to ensure, prior to the introduction of the Community Infrastructure Levy (CIL), that obligations were only sought when they passed the three tests in S122 of the CIL Regulations (2012). The three tests are:

- a. Necessary to make the development acceptable in planning terms;
- b. Directly related to the development; and
- c. Fairly and reasonable related in scale and kind to the development.

There was also concern that the policies were not flexible enough to take account of changes in viability over time.

There was support for the introduction of CIL although one consultee considered it should not apply to residential extensions or 'self-builders'.

While consultees noted the Infrastructure Delivery Plan in Appendix B, there were concerns that not all the critical infrastructure was identified or was to be identified through other local development documents or masterplanning work. There was also a 'holding objection' as the transport evidence base was not complete.

Appendices and Glossary

Appendix A: Strategic Site Schedules and Plans

- The Transport Assessment should be updated;
- Shortfall in health provision should be addressed alongside proposed development;
- If Carbon Zero homes can't be achieved the number of dwellings should be reduced;
- Affordable Housing should be flexible and include a mix of tenures
- No evidence on how percentages for Affordable Housing has been arrived at;
- Draft masterplans should be produced to demonstrate allocations proposed are realistic and deliverable;
- Ensure a consistent approach to site costs;
- English Heritage requested that information regarding the heritage assets in close proximity to sites or locations for growth be included in the site schedules.

Appendix B: Critical Infrastructure Requirements

The Highways Agency noted that Appendix B principally includes highway infrastructure that is already committed. There is limited reference to the need for any other highway infrastructure that is required within the plan area to support growth. It is possible that further highway infrastructure requirements will be identified through on-going preparation of the transport evidence base by the authorities or by master planning work and preparation of transport assessments in conjunction with the planning process.

Appendix C: Housing Trajectories

The trajectory does not accord with the NPPF and should be reissued based on the policies of the ACS and the need to have a five year land supply, and sites under 500 houses should be fully addressed and smaller sites allocated; A buffer of either 5% or 20% should be included.

Appendix D:

NHS Nottingham City stated that other priority areas should be ticked against the Healthy Nottingham priority as they are also determinants of the health targets within the Sustainable Communities Strategy.

Appendix E: Saved Policies from Adopted Local Plans

None

Glossary

The definition of 'economic development' from the NPPF should be included;

The definition of 'primary shopping frontages' should be amended as it is unnecessarily constraining;

A definition of 'primary shopping areas' should be included;

The use of 'town centres' as both a specific and generic term is potentially confusing.

Habitats Regulations Assessment

Natural England considered that the document appeared to draw reasonable conclusions and the Aligned Core Strategies had responded to the process and the findings.

Equalities Impact Assessment

None raised.

Sustainability Appraisal

Natural England considered that the SA sets out the stages in the process, draw reasonable conclusions and the plan has responded to the process and findings.

However, a number of concerns have been raised by consultees on the SA process and the outcomes, these include:

- signs that the process has been used as a post hoc justification for decisions and that it has not been an integral part of the planning making process.
- concerns about the SA objectives chosen and that more weight should have been given to environmental considerations.
- criticism that the colour coding scheme that is used is arbitrary.
- criticism that the team producing the SA was not sufficiently independent of the policy writing process.
- concerns were also raised that insufficient clarification is given on some of the alternative growth options such as medium and low growth option.
- an assessment of a phasing policy should also have been included.
- an assessment of alternative growth strategies including the more flexible approach to PUA/Non PUA should have been included
- SHLAA sites should have been assessed as part of the SA.
- concerns about the consistency of the site appraisals were also raised

Summary of Proposed Changes to Policies

Full details of the proposed changes can be found in the Schedule of Proposed Changes (February 2013).

- The key change is the introduction of a new policy and justification text on the 'presumption in favour of sustainable development', which the Planning Inspectorate is requesting in all Core Strategies since the publication of the NPPF. It sets out a positive approach to planning proposals with the aim of working jointly with applicants to develop acceptable schemes;
- Policy 1 'Climate Change' – minor amendments proposed to clarify how feasibility and viability with policy requirements will be assessed. Clarification of the approach to development in areas of flood risk are also proposed;

- Policy 2 'Spatial Strategy' - largely proposed to be unchanged. Minor changes proposed are to update the anticipated levels of housing development over the plan period to reflect more recent information, changes to the retail part of the policy to better reflect the NPPF, and minor clarification of transport schemes;
- Policy 3 'Green Belt' no proposed changes;
- Policy 4 'Employment Provision and Economic Development' – minor changes proposed to make the policy clearer;
- Policy 5 'The City Centre' - proposed to be changed to clarify the approach to Primary Shopping Frontages, and the contribution historic assets make the City Centre's character, distinctiveness and economy;
- Policy 6 'The Role of Town and Local Centres' - changes proposed to bring it into line with the NPPF, especially with regard to the sequential test;
- Policy 7 'Regeneration' - no significant proposed changes;
- Policy 8 'Housing Size Mix and Choice' - proposed to be changed to better reflect the City Council's approach to Houses in Multiple Occupation;
- Policy 9 'Gypsies, Travellers and Travelling Show People' - has no significant proposed changes;
- Policy 10 'Design and Enhancing Local Identify' – proposed changes to ensure issues over ground conditions, such as land instability and contamination, are properly considered;
- Policy 11 'The Historic Environment' – minor changes for clarification;
- Policy 12 'Local Services and Healthy Lifestyles'- minor changes proposed to improve policy clarity;
- Policy 13 'Culture, Tourism and Sport' – no significant proposed changes;
- Policy 14 'Managing Travel Demand' and Policy 15 'Transport Infrastructure Priorities' – proposed to be changed in line with representations from the Highways Agency and to provide further clarification;
- Policy 16 'Green Infrastructure' – proposed changes to clarify the approach to development on open spaces;
- Policy 17 'Biodiversity' – proposed changes to clarify the level of protection to be accorded to sites of biodiversity and fully reflect the NPPF;
- Policy 18 'Infrastructure' and Policy 19 'Developer Contributions' – proposed changes to improve clarity; and
- Changes to the Introduction, Vision and Objectives, and policy justification text reflect the changes mentioned above and provide updated information.

- Changes to the Appendices, including Strategic Site Schedules and Plans, Critical Infrastructure Requirements, Housing Trajectories and the Glossary to reflect changes made to the policies and to respond to representations.