

**THEME 1: A CITY WITH A SUSTAINABLE FUTURE
PLANNING ISSUE OR ACTION FOR CONSIDERATION
1st April 2018**

The comments have unique codes as follows:

- EQ = electronic questionnaire response
- Q = paper questionnaire response
- EM = email response
- WC = web comment

However, no personal details have been provided.

The letters making comments relevant to this theme are coded as follows:

- L2: The Coal Authority
- L4: Campaign to Protect Rural England
- L6: Durham Bird Club
- L8a: Durham City Cricket Club Response
- L9b: Durham County Council Appendices ABC
- L14: Environment Agency
- L15: Gladman Developments Limited
- L16: Historic England
- L18a: Lovegreen Developments
- L21: Natural England
- L23: Nevilles Cross Community Association
- L24: Northumbrian Water
- L25: Persimmon Homes Durham
- L26: Southlands Management

The codes for categorising the comments are as follows:

- c1: outside the remit of the neighbourhood plan
 - c1a: outside the Plan area
 - c1b: planning issue that has to be dealt with by the Council or by other bodies not by a neighbourhood plan
 - c1c: not a planning issue
- c2: a generic style comment of praise, blame, opinion etc not requiring a response just an acknowledgement
- c3: suggesting changes to the policies
- c4: suggesting changes to the projects
- c5: suggesting changes to the other text of the Plan

The issues for consideration are listed under a general section and then under each policy. For clarity, under each section only the relevant text in the columns is included. Similar comments have been grouped together as far as is possible.

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COMMENTS TO PRE-SUBMISSION CONSULTATION DRAFT	COMMENT CATEGORISATION	PLANNING ISSUE OR ACTION TO BE CONSIDERED
General comments about theme, or relevant across policies		
<ul style="list-style-type: none"> • Vision • How to deal with Q57 • Balance between protection and development • Low carbon energy • Key Issue: Introductory words of policies • Key issue: Definitions and scope of policies • Water quality • Air quality 		
Vision		
<p>EQ31. Slightly amending of the wording of the vision statements to provide consistency of wording with the overall vision would be helpful. For Theme 1: Durham City will have developments that meet current needs without limiting the ability of future generations to meet their needs. All new development will contribute to a long-term sustainable future for Durham City by ensuring a satisfactory balance among environmental, social and economic outcomes.</p>	C5 Suggested text change to vision statement	Consider suggestion. Note that ALL vision statements need revising. We had agreed changes.
<p>L23. We agree with Policies S1 and S2 as general statements of intent but our agreement is only partial in that we consider that the Plan should be more direct about what type of City the Plan wants. From the Plan the inference is for a City whose primary focus is as a tourist destination and residents' city, which we support. We believe that both an unrealistic ambition for an entrepreneurial hub which is not supported by empirical evidence and a rapidly-emerging likelihood of a campus city by default. In relation to the latter, the failure to establish an overall strategic focus for the City has also led, either explicitly or implicitly, to the vacuum being filled by the University whose unrelenting ambitions is likely to lead to demands for changes that could affect the City's infrastructure, facilities and services at the expense of residents and tourism.</p>	C5 Support for S1 and S2 in general, but critical that overall vision not strong enough to protect city from excessive university expansion	Consider reviewing vision

How to respond to Q57		
Q57. I no longer have access to the pdf version of these comments due to problems with my laptop.	It is difficult to respond to these comments. They cover a wide range of issues and generally say sensible things (apart from the preamble that states that the consultation document was not a plan). However, they do not correspond to what is said in Theme 1 generally and in S1 and S2 in particular. I would welcome advice about how to deal with these comments. Others will face the same issue as the comments cover all themes and policies.	Needs WG discussion
Balance between protection and development		
WC13 The way in which the principles of sustainability are interpreted and applied are, in my view, of paramount importance to planning decisions with the potential to damage Our Neighbourhood. Balance within the Plan My sense, at the moment, is that the draft Plan does not quite strike the right balance between seeking to conserve and protect all that is good about Our Neighbourhood and promoting and enabling beneficial development. This will be difficult to achieve when the role of Neighbourhood Planning Forum is constrained the way it is. Hopefully the opportunity may still exist to redress this imbalance by seeking to further strengthen the Implementation Section.	C5 Supportive comment but concern about balance between protection and development	Need to consider concern about balance and need to strengthen implementation section
Low carbon energy		
WC58 I support all of the listed measures and would like to see more work on low carbon energy and the possibilities in Durham. Would it be possible to draw up a map showing low carbon energy sites		Pursue reference to Durham Energy Institute (Check with Evelyn Tehrani); perhaps an additional project?

<p>of interest? These could include the Rivergreen Centre and the Archimedes Screw on the river Wear, and maybe sites outside the boundaries of the Neighbourhood Plan such as Sacriston Medical Centre and Harehope Quarry near Frosterley (which have won environmental awards). There must be other interesting micro/community initiatives out there worthy of attention and the Durham Energy Institute is a mine of information. If energy prices rise and new forms of energy/better insulation & energy efficiency become pressing needs then people will need inspiration and guidance. It would be great if Durham could build on its coal heritage to be a '21st century energy city' with cheap and sustainable energy for householders and businesses.</p>		<p>Policy S2.4 encourages low energy usage and the use of renewable sources</p>
KEY ISSUE: Introductory words of policies		
<p>Q62. The headline wording of S1 and S2 is too vague: “as many as appropriate of the following” will lead to approval. What if none of the clauses is met / achieved? How many is appropriate? Who determines what is appropriate?</p>	<p>C3 Suggested policy strengthening</p>	<p>Need to consider introductory wording of S1 and S2. Similar comment from DCC & WC94 WC15.</p>
<p>WC15 POLICY S 1. I support all the listed measures, but I would suggest that the second line of the opening sentence should say "...would promote as many as possible of the following measures." That might better encourage planning applications which help to promote sustainable development.</p>	<p>C3 Suggested policy strengthening</p>	<p>Need to consider introductory wording of S1 and S2. Similar comment from DCC & WC94 & Q62</p>
<p>L16. I am concerned that the main sentence of both policies [S1 and S2] only requires proposals to ‘promote’ the criteria set out. This is a less onerous requirement than ‘satisfy’ or ‘fulfil’, which I recommend using instead.</p>	<p>C3 Suggested policy re-wording to strengthen requirements</p>	<p>Consider suggestion, noting that DCC is also concerned about this wording, as are several other respondents</p>
<p>L9b Whilst the county council supports the inclusion of a policy which sets out parameters for judging the sustainability credentials of a proposal, as specified in a recent Health Check it maintains that in the interests of clarity and effective future application of the policy the opening sentence should be reworded. For example: “Support shall be given to the alteration or extension of existing buildings which fulfil all of the following criteria that are applicable</p>	<p>Concern about the opening words of the policy.</p>	<p>Consider this suggestion with others on this point</p>

<p>to it.” As it reads at present it is not clear whether the policy would support a proposal if only one of the criteria is met.</p>		
<p>KEY ISSUE: Definitions and scope of policies</p>		
<p>L9b Objectives The objectives set out in 4.8 fail to fully reflect the actual stated scope of the policies proposed within this section of the plan given Policy S2 includes alterations to existing buildings. Furthermore it is unclear as to whether the intention of this section of the plan is to relate to all new proposals requiring planning permission which fall within the wide planning definition of ‘development’ or whether this has been intentionally omitted and a much narrower scope relating to new buildings and conversions/ renovations of existing buildings adopted. Justification At 4.13 the county council considers that the text does not fully reflect the actual scope of the policies in this section of the plan as Policy S2 also relates to ‘renovations and extensions’ to existing buildings. Furthermore, as mentioned above it is unclear as to whether the intention of this section of the plan is to relate to all new proposals requiring planning permission which fall within the wide planning definition of ‘development’ or whether this has been intentionally omitted. This ambiguity is replicated in the titles and opening sentences of Policies S1 and S2. It is also very unclear as to whether it is intended that these policies may be used in conjunction with one another in some instances, particularly where a proposal relates to part new build and part conversion. It would be prudent to combine these policies or make it more explicit if they are intended to be used in conjunction with one another, particularly as some of the criteria potentially relates to all proposals. At 4.16 it is presumed, having read the remainder of the justification that reference is made to the county council’s strategies to demonstrate that the policies within this section support and compliment these. It is suggested that the text is amended to clarify this so as to provide a clearer justification for these policies. Furthermore, in the interests of clarity the justification text (at 4.13 -4.23)</p>	<p>C5 Concern about mis-match of policies and objectives</p> <p>c5 Concern about the intention of the policies</p> <p>c5 Concern about the definitions and scope of the policies</p> <p>C3 Concern about whether these policies are to be used together</p> <p>c5 Concern that the text does not make it clear enough that the policies are intended to support and complement DCC's strategies</p> <p>c5 Concern that justification is not</p>	<p>Consider reviewing consistency of objectives and scope of policies</p> <p>Consider reviewing definitions and intention of the policies</p> <p>Consider reviewing text in light of final version of policies</p> <p>Consider reviewing text and make relationship between the policies clear. S1 refers to sites and S2 refers to buildings, but check clarity of wording</p> <p>Consider amending text to make this clear</p> <p>Consider reviewing text to make</p>

<p>would in parts benefit from a degree of rationalisation and rewording to ensure that a clear and focused justification for the policies is apparent to the reader.</p> <p>At 4.23 the relevant saved local plan policy has been referenced. The text would appear to relate to the content of saved Policy U9 and not U10 as stated. This point has previously been highlighted to the Forum.</p>	<p>sufficiently clear</p> <p>c5 Concern that reference to saved policy is incorrect</p>	<p>sure it is clear</p> <p>This point was unfortunately not picked up from DCC's earlier response and the reference will be checked and revised as necessary</p>
<p>Water Quality</p>		
<p>L14 Although the consultation document makes reference to issues such as flooding, green infrastructure, green corridors and biodiversity, we would support greater references to water quality. In particular, we would welcome references to blue infrastructure and the importance of water for people and the environment. Blue infrastructure is a subset of green infrastructure and included rivers, ponds, streams, wetlands and their riparian margins. Rivers, lakes, coastal and ground waters are an important resource for people, the environment and supporting industry, wildlife, tourism and recreation. We would welcome the inclusion of objectives in relation to The Water Framework Directive (WFD). The WFD is a European Directive that requires all water bodies to achieve good status by 2021. It also aims to prevent deterioration in waterbody status; reduce water pollution; conserve aquatic ecosystems and habitats; reduce the effects of floods and droughts on waterbodies and promote sustainable use of water as a natural resource. We suggest that further detail could be included in the plan regarding the protection of waterbodies from pollution and management of waterbodies so that they reach and maintain a good and sustainable waterbody status. The Northumbria River Basin Management Plan sets out which actions and measures are needed to achieve the objectives of the WFD.</p>	<p>C3 / c5 Extensive suggestions about blue infrastructure, Water Quality, waterbodies and the Water Framework Directive.</p>	<p>Consider ways to strengthen policies and supporting text in light of this strong guidance from the Environment Agency.</p>
<p>Air Quality</p>		
<p>Q58. 4.19 Indicates that NPs have limited means for addressing Air Quality. Nitrogen Dioxide is a serious issue for parts of Durham City. This should be addressed specifically in the NP to encourage the County Council to be more active in addressing this.</p>	<p>Concern about air quality</p>	<p>Concern noted. DCC primarily responsible but we need to consider any measures we can include. The Transport theme is the</p>

		obvious place for this. In addition, S1.11 has as one of the criteria for acceptable sites "ease of access by public transport, walking and cycling". Can we do more?
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Policy S1: Sustainable Development Requirements of All Development and Re-development Sites		
<ul style="list-style-type: none"> • Coal Authority • S1.2 Protection of the Green Belt • S1.3 Biodiversity • S1.5 Flood risk • S1.7 Conservation and heritage • S1.8 Green assets • S1.10 Access: disability • S1.11 Access: transport 		
Coal Authority		
L2. The Coal Authority would wish to see consideration given to the risks posed to the proposed developments by past coal mining activity in accordance with National Planning Policy prior to any formal allocation.	C3 Suggested policy addition to require checks with the Coal Authority before allocation of sites	Consider policy addition, though probably already covered by national policy
S1.2 Protection of the Green Belt		
L9b. Since the Health Check criterion 2 has been amended. This criterion now effectively introduces a sequential test. There is already well established national and local Green belt policy available for determining the acceptability of development in the Green Belt. Therefore it is considered that 'to protect the Green Belt' should be deleted.	c3 Concern about the wording of this criterion. At the moment it reads: " redevelopment of a brownfield site to protect the Green Belt, as long as its biodiversity is protected."	Unsure about the reference to a sequential test. Suggest that the reference to protecting the Green Belt should be moved to the justification text.
L15. Whilst we support the general approach to the policy in principle, Gladman is concerned that the emphasis of the policy is to 'protect' the greenbelt through the redevelopment of brownfield land. Whilst noting the importance of Green Belt, it is important to note that the Plan does not set out an approach which seeks to 'protect' the existing Green Belt when the redrawing of Green Belt boundaries may be necessary through the subsequent Local Plan review and it is important the DNP does not undermine the potential future need for development and release of land from the Green Belt and could result in the NDP becoming out of date	C3 Suggested policy amendment to remove reference to protection of the green belt	Consider suggestion

should this occur. In this regard, this element of the policy should be modified to 'Redevelopment of a brownfield site within the neighbourhood area will be supported'.		
L 26 Any comments on Theme 1: We broadly support the intentions of draft Policies S1 and S2 although we suggest the following minor amendments to ensure the policies are consistent with national policy. Policy S1 sub point 2 includes the following measure: "redevelopment of a brownfield site to protect the Green Belt, as long as its biodiversity is protected". We suggest revising this to: "encouraging the redevelopment of brownfield sites as long as its biodiversity is protected". The reference to protecting the Green Belt is not required as national policy outlines that inappropriate development will only be permitted in the Green Belt in very special circumstances or in exceptional circumstances if proposed for development through the emerging Local Plan.	C3 Suggested policy re-wording to remove reference to protection of the green belt	Consider suggested wording
S1.3 Biodiversity		
L6. In point 3 you mention the protection of biodiversity. Can I suggest that this should also include the enhancement of biodiversity – I suggest this is consistent with paragraph 109 of the NPPF.	C3 Suggested policy addition to enhance biodiversity	Consider policy addition
L15. Gladman is further concerned with the policy's emphasis towards the 'protection of biodiversity/geodiversity, designated wildlife sites and protected species'. It is a concern that the emphasis of the policy is very much on 'protection' of these assets as opposed to the approach required by paragraph 113 of the Framework which refers to the need for criteria based policies in relation to proposals affecting protected wildlife or geodiversity sides or landscape areas, and that protection should be commensurate with their status and gives appropriate weight to their importance and contribution to wider networks.	C3 Suggested policy amendment to reduce protection of biodiversity etc.	Consider suggestion
L21. Natural England welcomes the inclusion of biodiversity in Policy S1, however, instead of only referring to the protection of biodiversity, we advise adding the enhancement as well, in line with NPPF policies 9 and 109	C3 Suggested policy re-wording to strengthen requirements	Consider suggestion
S1.5 Flood Risk		
L14. Further to this we support Policy S1 to promote resilience to climate	C3 Support for policy but suggested	Consider adopting suggested

change including avoidance of sites in the flood plain. However for clarity I would advise that point 5 of policy S1 could be re-worded to the following: <i>resilience to climate change including avoidance of sites in flood zones 2 and 3.</i>	policy wording to avoid sites in flood zones 2 and 3.	wording
S1.7 Conservation and Heritage		
L16. The revised wording of Policy S1 point 7 still does not reflect our recommendation at the last stage. Following our previous comments, the word 'significance' is still missing (a very important concept which underpins the NPPF's approach to historic environment management) and the wording in brackets in the policy ambiguously includes some types of heritage assets but excludes others. It would be better to read, for example: "Protection and enhancement of the significance of designated and non-designated heritage assets, including significance derived from their setting, as well as of character, local distinctiveness, views, tranquillity and the contribution made to sense of place". You could name the different types of heritage asset (see the NPPF's definitions) in the supporting text.	C3 Suggested policy re-wording to clarify policy. Previous comments dated 16 Jan 2017	Consider suggestion after checking previous comments
L9b Furthermore the county council continues to have concerns about the following criteria set out in this policy in the interests of facilitating the effective application and defence of this policy at appeal: Criterion 7: It is considered that this criterion should simply refer to designated and non -designated heritage assets or provide an exhaustive list of those assets should be included. At present the list provided is incomplete and reference to heritage asserts is repeated in the same sentence.	C3 Concern about the clarity of this criterion	Consider revising wording with advice from DCC
S1.8 Green Assets		
L9b Furthermore the county council continues to have concerns about the following criteria set out in this policy in the interests of facilitating the effective application and defence of this policy at appeal: Criterion 8: It remains concerning that specific reference is not made to biodiversity. Although it could be argued that biodiversity is included within the term 'green assets' this is not explicit and a definition is not provided within the plan. The county council considers that the use of the	c3 Concern about lack of clarity about biodiversity and green assets	"Green assets" are defined in para 4.62 and biodiversity is dealt with in S1.2 and S1.3. However, this

term 'natural environment' or provision of a clear definition is required.		wording can be reviewed with advice from DCC
S1.10 Access: disability		
Q68. S1 Should also include disabled access. We have an ageing population. We need to take this into account	C3 Concern about access	Access covered in S1.10 but could be strengthened / highlighted.
WC185 Comment on your post "Policy S1" In its policy setting out requirements for all development and re-development sites in the City, the Plan draws attention to the need for a coordinated approach to paving, lighting and signage. We endorse this part of the policy, and also the part which draws attention to the need for ease of access by public transport, walking and cycling, to all development and re-development sites, provided that means ease of access for all residents and visitors, including those with disabilities.	C3 Concern about access	Access covered in S1.10 but could be strengthened / highlighted.
S1.11 Access: transport		
L9b Furthermore the county council continues to have concerns about the following criteria set out in this policy in the interests of facilitating the effective application and defence of this policy at appeal: Criterion 11: In order that it is clear that this criterion relates to ensuring a development's has a good relationship to existing transportation opportunities is considered that this should be amended to read; 'ease of access <u>to</u> public transport, walking and cycling <u>opportunities</u> '	c3 Concern about the clarity of this criterion	Consider accepting suggested re-wording

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Policy S2: Sustainable Development Requirements of All New Building Developments Including Renovations and Extensions		
<ul style="list-style-type: none"> • Access requirements • Importance of views • S2.1 Architectural styles • S2.4 Building standards • S2.5 Water environment • S2.6 SUDS • S2.9 Re-use of vacant buildings 		
Access Requirements		
Q68.S2. Plans for new builds and refurbishing must be assessed by a qualified access consultant not an architect who thinks he knows.	Concern about access	Access covered in S1.10 but should be strengthened / highlighted. Not mentioned at all in S2!
Importance of Views		
L16. In Policy S2, I am surprised you have deleted point 2 from the previous draft because the issue of views, setting and skyline is so important in your plan area. My revised wording for point 7 in Policy S1 might provide similar protection (you will note I included the word 'views' in that).	C3 Suggested policy re-wording to clarify policy. Previous comments dated 16 Jan 2017	Consider suggestion after checking previous comments from Historic England
S2.1 Architectural Styles		
L9b. Furthermore the county council continues to have concerns about the following criteria set out in this policy in the interests of facilitating the effective application and defence of this policy at appeal: Criterion1: This criterion does not accord with paragraph 63 of NPPF. The implication is a resistance to modern architecture and stifling of innovative design.	c3 Concern that the criterion does not accord with NPPF	Reconsider wording, but there is no intention to resist "outstanding or innovative designs which help to raise the standard of design more generally in the area" (NPPF, 63)

S2.4 Building Standards		
Q68. S2 Buildings should not be built to minimum building standards but to best practice.	Introduces notion of “best practice”.	Consider in the context of considering L25 below.
L9b. Furthermore the county council continues to have concerns about the following criteria set out in this policy in the interests of facilitating the effective application and defence of this policy at appeal: Criterion 4: The wording introduces an intangible measure which could result in inconsistent decisions.	c3 Concern about the implications of this criterion which reads: “utilisation of the highest appropriate building standards to ensure minimal energy consumption and maximum energy generation and use from renewable resources, including the use of energy efficient solar design principles”	Unclear about the nature of this comment. Reconsider wording with advice from DCC
L 25. Persimmon Homes object to Policy S2 point 4. The latest update to Building Regulations introduced a requirement for new dwellings to achieve or better a fabric energy efficiency target in addition to carbon dioxide targets. In essence the issue of energy efficiency, energy generation and move toward zero carbon are no longer planning matters nor are Building Standards generally both of which are matters of Building Regulations, and as such point 4 of Policy S2 is unnecessary. It is unclear if the purpose of the policy is to ensure new developments achieve appropriate Building Regulations as it refers to simply building standards. Due to the above points Persimmon Homes suggest that either Policy S2 point 4 is removed or amended to read: “Constructed to the appropriate Building Regulations Standard.”	C3 Suggested re-wording of S2.4 about Building Regulations.	Consider suggested wording
S2.5 Water Environment		
L9b. Furthermore the county council continues to have concerns about the following criteria set out in this policy in the interests of facilitating the effective application and defence of this policy at appeal: Criterion 5: Clarification as to what constitutes ‘water environment’ should be provided.	c3 Need to clarify “water environment”	This needs to be considered in the light of comments from the Environment Agency in L14 which wants more emphasis on “blue

		infrastructure”. Adopting their suggestions should address this point. The point below about SUDS is also relevant.
S2.6 SUDS		
L6. Point 6 (SUDS) is fully supported as these can also benefit wildlife particularly some water birds.	C3 Supportive comment about SUDS but with additional benefits to birds	Consider additional wording
L14. We encourage sustainable flood prevention measures within new development such as SUDs and we recommend that these are designed in a way that provides additional habitat.	C3 Supportive comment about SUDS with addition about habitat enhancement. (See L6 and L24)	Consider additional wording
L24. Furthermore we are pleased to welcome point 6 which aims to utilise a sustainable drainage approach through promoting the use of Sustainable Urban Drainage System (SUDS). Such systems can provide multiple benefits in addition to their primary role in flood risk management. Additional benefits include the potential for improvements to water quality, amenity and biodiversity in the local area. We welcome that the Neighbourhood Plan encourages the use of SUDS on new developments and consider that this will promote sustainable water management in the neighbourhood plan area.	C3 Support for S2.6 promoting SUDS and its environmental benefits	Support noted. Consider additional wording in supporting text
S2.9 Re-use of Vacant Buildings		
L9b. Furthermore the county council continues to have concerns about the following criteria set out in this policy in the interests of facilitating the effective application and defence of this policy at appeal: Criterion 9: As there is ambiguity regarding the scope of developments relating to Policies S1 and S2 it is unclear as to whether should in fact be located in Policy S1. Furthermore, the unstated implication of this criterion is that proposals relating to under used or occupied building are not supported which may be an unintended consequence.	c3 Suggestion that this should be in S1 and that there might be an unintended consequence	The criterion relates to buildings rather than sites and so should be in S2. The intention is to encourage the re-use of vacant buildings and it is intended precisely to support proposals relating to under-used or unoccupied buildings

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Policy S3: Masterplans / Development Briefs		
Q43. I think the quality of new development in the City is barely adequate for an ordinary place, let alone a Cathedral City with a World Heritage site, A Policy S3 is needed that requires any sites above a minimum size to have a design brief or for larger sites a master plan	C3 Suggested policy addition	Consider policy addition; could perhaps be incorporated in S1. See suggestion about Development Briefs in L18a
L18a. Development Briefs were in the past very useful to developers and the general public alike, not to mention the LPA. Would it not be in the interests of the City to restore them?	C3 Suggests restoration of Development Briefs	Consider suggestion. See also above suggestion about an additional policy S3.