

Review of the Development Management Policies Development Plan Document

Woking Borough Council

July 2021



Review of the Development Management Policies Development Plan Document

The Development Management Policies Development Plan Document (DPD) was adopted in October 2016. The DPD contains policies to help determine day to day planning applications. Alongside the draft Site Allocations DPD, its purpose is to deliver the strategic objectives, requirements and policies set out in the Core Strategy (2012, reviewed 2018). It offers detailed policy guidance that seeks to deliver or clarify the strategic policies contained in Core Strategy (its 'parent policy') and provides a framework for the sustainable and effective delivery of the Core Strategy.

The Council has undertaken a review of the Development Management Policies DPD to determine whether there is a need to update it, in line with national guidance and legislation. Regulation 10A of the Town and Country (Local Planning) (England) Regulations 2012 (and amended) stipulates that local plans must be reviewed to assess whether they need updating at least once every five years. This is also set out at paragraph 33 of the National Planning Policy Framework. It will be five years since the adoption of the DPD this October, and the review has been undertaken to fit within this timeframe.

Planning law sets out that national planning policy framework must be taken into account in the preparation of Local Plans and must reflect and where appropriate promote relevant European Union obligations and statutory requirements. This is stipulated in section 19 of the Planning and Compulsory Purchase Act 2004, and is again reflected in the NPPF at paragraph 33, which states that local plan reviews should take account of changes to national policy and also changing circumstances affecting the area. The relevant European Directives have been transposed into United Kingdom law. The current NPPF (2019), which has been updated since the examination and adoption of the Development Management Policies DPD in 2016, has been assessed as part of the review of the DPD. Furthermore, the NPPF states (at paragraph 31) that the review of policies should be underpinned by relevant and up to date evidence. This evidence should be adequate and proportionate, focus tightly on justifying and supporting the policies concerned, taking account of relevant market signals. The policies within the Development Management DPD have been assessed against this guidance.

In order to help the Council understand how useful and effective the Development Management Policies DPD has been since its adoption, and as a key part of evidence gathering for the review, focused stakeholder engagement has been undertaken with users of the document. This has been with a wide range of stakeholders, including statutory consultees, neighbouring and nearby local authorities, local residents associations and neighborhood forums, the business community and other relevant organisations. A number of focused meetings have been undertaken, and written comments were also invited. Within the Council, discussions have been undertaken with relevant teams, including Development Management, Arboricultural Officers, Green Infrastructure, Environmental Health and the Flood Risk and Drainage team. Within this engagement, the Council had sought feedback about how well the DPD's policies are working. As part of both internal and external stakeholder engagement, participants have also been asked to consider and highlight any gaps in policy that may need to be addressed.

The response to this engagement has been considered in detail, and Table 1 presents a summary of feedback from users. The issues raised are considered and analysed alongside the matters addressed in the review, as referred to above, namely:

- The conformity of policies with national planning policy;

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Whether the policies continue to provide an effective framework for delivery of development outlined in the Core Strategy.

This assessment leads to a judgement about whether a modification or change to policy is needed at the current time. Alongside this is an analysis of potential gaps in policies (Table 2) raised through stakeholder engagement and evidence gathering.

The conclusion of the review can be found at page 17. The Council is aware of the Government's proposed changes to the planning system contained in the Planning White Paper. The White Paper was a subject of consultation in August 2020, and is now going through its parliamentary procedures. The implications of the Government's proposals when they are published will be considered appropriately by the Council. The Woking Core Strategy would be subjected to its own review at the appropriate time. If the outcome of that exercise were to justify a modification of the Development Management Policies DPD, the Council will take the necessary steps to do so.

Table 1: Development Management Policies DPD Review – outcome assessment

DMP DPD Policy Theme	Summary of feedback from users	Conformity with national planning policy	Continued effective framework for delivery of development outlined in the Core Strategy	Is a modification required?
GI Policies DM1: Green Infrastructure Opportunities DM2: Trees and Landscaping DM3: Facilities for Outdoor Sport and Recreation DM4: Development in the Vicinity of Basingstoke Canal	Suggest that DM1 be strengthened to require developers to contribute to Green Infrastructure, rather than simply encouraging it. In connection with this, could a map of Green Infrastructure opportunities be made easily available to Development Management officers? Concern about whether CIL is currently delivering enough green infrastructure. Need to secure contributions to green infrastructure off-site where it cannot be delivered on-site, for example in the Town Centre. Provide a policy hook for a potential Biodiversity SPD. Provide for Nature Recovery Networks and Local Nature Recovery Strategies. Add text to paragraph 3.8 drawing developers' attention to the Great Crested Newt habitat improvement plan. Consider links with neighbouring boroughs (especially relevant for Byfleet and West Byfleet ward)	These policies continue to be consistent with NPPF- in particular paragraphs 96- 101 and 170-177- and PPG requirements, including the new PPG on the Natural Environment published in 2019 (which largely expands on principles previously contained in the NPPF).	The policies continue to provide an effective means to deliver the development outlined in the Core Strategy. Core Strategy policy CS17 already includes a requirement for residential development to contribute to Green Infrastructure, and the qualitative standards in policy DM1 relate to this existing requirement (as do the quantitative standards in Core Strategy Appendix 4). There is no indication that the qualitative standards themselves are underperforming. CIL is a standardised levy that is charged on development. The charge is set at a level that would not unduly the viability of development. There is a significant gap between the overall cost of infrastructure and what could be secured from CIL contributions. Nevertheless, the Council has identified green infrastructure (SANGs) as one of four key infrastructure areas that would benefit from CL funding. This is already highlighted in the Council's Infrastructure Funding Statement and the Infrastructure Capacity and Delivery Plan. It will not require a modification to the DM Policies DPD to update the mapping used by Development Management as suggested, to make officers more aware of Green Infrastructure opportunities. A work programme will be put in place to address this matter outside of the plan making process. It is considered that Core Strategy policies CS7 and CS17 between them will provide an adequate policy hook for any new SPD or guidance relating to biodiversity. Information on	No

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	DM2: Introduce a sentence to supporting text to state that green roofs cannot be used for irrigation,		the direction of Government environmental policy is awaited to inform any decisions on this.	
	they are a SUDS feature.		The insertion of supporting text on various matters raised would seem potentially desirable	No
	Consider including policy on veteran trees following update to NPPF.		if it is decided to carry out a review. However, these proposals would not affect the substance of the policies, but rather bring particular issues	
	DM3: Specific- possibly locally specific- SANG standards should		to applicants' attention; this is currently achieved by other means. The current lack of such text is not considered to prevent the effective delivery	
	be included, either in Policy DM3 or elsewhere. This particularly relates to bespoke SANG		of the Core Strategy, and so does not in itself justify an immediate review of the DMP DPD.	
	provided by developers. Sports pitches should be		Links with Green Infrastructure in neighbouring boroughs are important, but these are addressed through the Green Infrastructure	
	underdrained to ensure they do not increase runoff above the pre- development rate.		Strategy (Natural Woking) rather than through the DM policies.	
	It was suggested that we should monitor the quality/maintenance requirements of green space, to provide evidence to support a policy review. A new Open Space Assessment would be desirable.		The existing policy does not mention veteran trees, however it is not out of conformity with national policy on such trees and this is considered to be an issue where local and national policy are complementary. Core Strategy policy CS8 already requires bespoke SANG to meet 'all relevant standards'	
	DM4: Expand paragraph 3.43 to refer to flood risk areas related to canal inundation.		including Natural England standards. The Thames Basin Heaths Special Protection Areas Avoidance Strategy provides detailed guidance on bespoke SANGs could be brought forward.	No
	Concern about increased recreational pressure on the Basingstoke Canal. Would like to see more positive policy to		Agree that a new Open Space Assessment would be desirable. This would better form part of the evidence for a review of the Core Strategy. The comment is noted and will be	

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	support conservation work on the Basingstoke Canal.		addressed as part of the future review of the Core Strategy.	
	DM4 is supported and should be extended to include the Wey Navigation and River Wey		Support for conservation works on the Basingstoke Canal is acknowledged. This would be better channelled through engaging with the Basingstoke Canal Authority and Canal Society on updates to the Infrastructure Development Plan and in Green Infrastructure plans and delivery. The existing DM4 is considered adequate to facilitate this in policy terms.	
			DM4 is focused on the specific development management issues of the canal. The protection of the Wey Navigation and River Wey is covered in CS7 and CS17, where specific policy advice seeks to protect these water courses for their Green Infrastructure and biodiversity value. In this respect, the existing policy framework is considered adequate and effective.	
Healthy Built Environment Policies DM5: Environmental Pollution DM6: Air and Water Quality DM7: Noise and Light Pollution DM8: Land Contamination	Important to retain the 'development sensitive to pollution' section. Paragraph 4.5: amend to refer to Drainage and Flood Risk Engineer alongside other consultees. Also the phrase 'ensure that the appropriate standards are met' does not reflect the current process, would be preferable to bring the wording here (and also in para 4.31) into line with para 4.13.	Policies continue to be consistent with NPPF requirements, including paragraphs 170, and 178 to 183 covering Ground conditions and pollution.	The policies continue to provide an effective framework for ensuring new development is appropriate for its location taking into account the likely effects of pollution, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. Suggested areas of improvement can be delivered by alternative means: a map layer can be incorporated into Woking MapViewer illustrating the outcome of the latest Annual Air Quality Status Report for use by DM Officers in applying policy DM6; further guidance can be provided on the Woking 2027 website around the Appropriate Assessment of impacts of development and thresholds for conducting detailed assessment of road traffic emissions; and policy DM7 provides flexibility for noise-	Νο

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	 Policy links: 'Woking Air Quality Assessments' should be 'Air Quality Annual Status Report'. Scope for further detail on the status of Air Quality Management Areas and any potential change in status, to inform decision-making under policy DM6. There is also potential to provide further information on the agreed thresholds which trigger the need 'to carry out an assessment of the impacts' on the SPA or SAC from road traffic emissions under policy DM6. Revise DM6 to state that development should protect features that are identified as important for air quality mitigation in AQMA Action Plans. Para 4.11: The Constitution Hill 		sensitive new development in the Town Centre to be satisfactorily mitigated – which is 'proportionate and reasonable to the circumstances of the case', taking advice from the Environmental Health team (as explained in paragraph 4.19 of the reasoned justification). The need for new development in AQMAs to be consistent with Air Quality Action Plans is covered in paragraph 181 of the NPPF.	No
	hotspot is now an AQMA (known as Guildford Road). The Environment Agency has issued new guidance on septic tanks; policy should refer. Concern was raised that DM7 was not considered to be up to date in line with wider guidance for mitigating noise-sensitive development and national planning policy, in particular for		Whilst minor amendments to policy DM7, and updates to the links and references to national policy documents and specific AQMAs could be carried out, this on its own would not warrant an immediate update to the DPD.	No

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	development coming forward in the Town Centre. Amendments to the policy were suggested which would bring it in line with industry standards.			
	Some of the British Standard documents and NPPG referred to are out-of-date, replace with the new standards. Concern raised on flooding, relating to the Sanway Byfleet Flood Alleviation scheme, Site Allocations assessment (of Byfleet and W Byfleet sites) and Environment Agency flood risk assessments.		These areas have been assessed and discussed in detail in the Examination of the Site Allocations DPD, and specific policy criteria within that document will ensure adequate site assessment and mitigation takes place to enable delivery. This DMP DPD policies continue to provide an effective framework for delivery of development, within its remit.	No
Housing and economic				No
policies DM9: Flats above shops and ancillary accommodation DM10: Development on Garden Land DM11: Sub-divisions, specialist housing, conversions and loss of housing DM12: Self build and custom build houses DM13: Buildings in and adjacent to the Green Belt DM14: Rural workers' dwellings DM15: Shops outside Designated Centres	There is general support from residents groups for more ambitious standards for internal floorspace and outdoor amenity space, particularly where they relate to HMOs (DM11) and flats above shops (DM9), with national standards being considered inadequate.	Policies continue to be consistent with NPPF requirements, particularly paragraphs 127 to 130, and national planning practice guidance.	Yes, the policies are effective with regard to the DMP DPD's remit and purpose. The DMP DPD states that a good quality of accommodation should be provided by meeting relevant housing standards, but does not set these standards itself. There are updated Building Regulations which will apply to homes created through PDR, and new minimum room standards for HMOs were introduced by the Government in 2018. The Nationally Described Space Standard applies for development that does not fall under the remit of permitted development (PD). Higher standards than the Nationally Described Space Standard and for HMOs can be taken forward through local plan preparation, but must be assessed with regard to development viability and local need for housing, on the size and type of units, in line with National Planning Practice	

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DM16: Servicing development			Guidance. This would therefore be considered as part of a future review of Core Strategy. Alternately, Neighbourhood Plans could take this forward, supported by appropriate evidence.	
	Concern was raised about the lack of reference and protection for bungalows, which are ideal accommodation for residents with mobility issues including the elderly. DM10 should be amended to prevent demolition of bungalows and to encourage creation of new single storey dwellings.		Regarding bungalows, this would be considered as part of the future review of the Strategic Housing Market assessment. The Council has a SHMA that sets out the housing need for the various section of the community. It had been prepared to support Policies CS11, CS12 and CS13 of the Core Strategy. The scope of the future review of the study could consider the role of bungalows in future housing needs. Alternately, if this is a local concern, Neighbourhood Forums could prepare a policy as part of the Neighbourhood Plan, supported by appropriate evidence.	No
	Development Management officers generally considered that the policies in this section of the DPD worked well but made specific comments as follows:	Policies continue to be consistent with NPPF requirements, including paragraphs 127 to 130, and	The policies continue to provide an effective framework for ensuring new development is delivered in line with the Core Strategy.	
	DM9, the part of the policy on ancillary accommodation/ annexes is considered by some to lack adequate guidance to assess planning harm, but generally considered helpful and to allow	national planning practice guidance.	DM9, on ancillary accommodation/ annexes, different wording is used by other LPAs has been explored but there is no evidence to show that such a modification would be more effective. Appeals analysis over recent years does not highlight specific issues relating to the use of this policy.	No
	reasonable flexibility. DM11 - further detail on character and design would be helpful to guide development decisions.		The point on DM11 is noted, however further detailed guidance can be found in the Design policies of the DPD and in the Design SPD (2015). The latter includes design principles,	No

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	 DM13 – in the policy's reasoned justification, there is inconsistency of wording disproportionate, as opposed to 'materially larger', regarding the NPPF guidance which distinguishes new buildings and extensions/ alterations in the Green Belt. Potential issues for DM9 and DM15 highlighted with regard to extended PDR. DM12 Self build and custom build homes. The policy is not used by DM Officers but has a purpose to provide in-principle support of national guidance. 	The main policy text is in general conformity with NPPF paragraph 145. There is a minor inconsistency in the policy's reasoned justification. DM12 is in general conformity with current National Planning guidance and the NPPF para 61. Note the Government's recent policy update (24 April 2021), the self and <u>custom build action plan</u> , which highlights the potential for scaling up of self and custom build delivery, which will be reported on through the 'Bacon review' and a review of legislation, both expected this summer.	 including on character (as referred to in the policy) with specific guidance given on different Character areas in the Borough, based on the Character Study (2010). The issue is noted. However, this inconsistency is not considered significant and can be clarified for operational purposes by the Planning Policy team in written guidance. It may not justify an update to policy at the current time. Reference to PDR is already included in DM9 and DM15, and is applicable to any changes to the remit of PDR. Analysis has been undertaken to explore the impact of expanded PDR and concluded that these policies continue to perform a relevant, if more limited, function. These policies can be retained without modification. The policy offers in-principle support for selfbuild homes. This is encouraged by national policy. Any further updates with regard to national policy and recent action plan will be dealt with following publication of the reviews mentioned to the left, in future local plan reviews. 	No

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Design Policies DM17: Public Realm DM18: Advertising and Signs DM19: Shopfronts DM20: Heritage Assets	DM17: Trees in the public realm need to be planted in ground that is clear of services, to allow space for the roots to grow. Underground space in the public realm is at a premium. Recommend adding a specific reference to cycle parking along with street furniture. Consider requiring green walls/roofs in the public realm where appropriate (such as bus chalters)	Policies continue to be in general conformity with the NPPF, in particular paragraphs 102-111 (promoting sustainable transport), 124-131 (design), 132 (advertisements) and 184- 202 (protecting and enhancing the historic environment) and PPG. The revised NPPF increases the flexibility	The issue of trees and underground services is already addressed briefly in the Design SPD. Therefore, while it may be desirable to insert this into policy, this should not be an issue which is preventing the effective delivery of the Core Strategy (if it is, this would be better addressed by reviewing internal procedures). Cycle parking facilities are a form of street furniture so would be covered by the design requirements in this policy. The Parking Standards SPD requires developers to provide cycle parking on-site, or off-site (in liaison with the Council) where that is not possible.	No
	shelters) DM19: Can shopfronts be required to show their building number?	afforded to LPAs in assessing advertisement applications. There have been many revisions to PPG on design and the historic environment, and some to that on advertisements, since the DPD's adoption. The DPD policies as they stand are not out of conformity with any of these changes. National policy on design has become significantly more detailed with the publication of the National Design Guide. However, none of the policies in this section of the DPD- which are either high level (DM17)	Policy CS7 of the Core Strategy is sufficiently flexible to allow scope for green roofs and greenwalls to be introduced where it is feasible and appropriate in its context. Guidance can be provided for proposals to be considered on their own merits. The Council will consider implication of any future national policy and act accordingly. Building numbers on shopfronts can best be addressed through other Council services and detailed application of current policies on design.	No

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		or cover specialised topic areas (DM18-20)- are out of general conformity with new national policy.		
		The key pieces of legislation affecting the Borough's heritage assets have not changed since 2016.		
Community and Communications Infrastructure Policies: DM21: Education Facilities DM22: Communications Infrastructure	There is scope to improve policy DM21 to make it more supportive of school development and to recognise upcoming changes to Permitted Development rights. Further clarity would be welcome under 'Application information' which only sets out requirements for developments involving the loss of open space. A definition of 'open space' would be useful. Improvements could also be made to policy DM22 to bring it up to date and in line with the latest Surrey County Council and national targets for next generation gigabit broadband. The policy should be updated to address poor design of telecoms masts.	Policies continue to be in general conformity with paragraph 94 (widening choice in education) and Section 10 (supporting high quality communications) of the NPPF.	Paragraph 94 of the NPPF emphasises how great weight should be given to the need to create, expand or alter schools through decisions on applications. Supported by this emphasis in national planning policy, policy DM21 supports proposals which meet various local criteria, which are still considered to be relevant. Forms of open space are listed at paragraph 5.146 of the Core Strategy, and policy CS17 seeks to prevent the loss of these forms of open space, including outdoor sports facilities and natural/semi-natural greenspaces. Whilst paragraph 7.9 of the DMP DPD could be improved to explicitly set out the application information required where a proposal does <i>not</i> involve the loss of open space, this would not warrant a review of the DMP DPD. A judgement can be made during the development management process on a case-by-case basis as to whether sufficient information has been submitted to demonstrate that the criteria under policy DM21 have been met.	No
			The policy can continue to apply to proposals which do not benefit from extended permitted development rights which came into force in April 2021.	No

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			It is recognised that policy DM22 refers to the 'Superfast Surrey' project, which has now been delivered and superseded with local targets to enable delivery of gigabit capable broadband coverage by 2025. However, the policy continues to provide an effective basis to ensure the built environment is directly served by the 'latest broadband technology', which includes, <i>but is not limited to</i> , fibre optic broadband technology. The policy points to strategic policy CS16, itself informed by the findings of the Infrastructure Delivery Plan. The 2021 IDP review will set out the latest communications infrastructure needs to meet growth in the borough, and development proposals are expected to take its findings into account until such a time that the roll-out of new gigabit- capable broadband infrastructure is secured through the Building Regulations regime. In addition, once proposed changes to permitted development rights to support the deployment of 5G and extend mobile coverage are introduced, the policy will only apply where communications infrastructure continues to require planning permission. Whilst the policy could benefit from minor editorial updates, this would not warrant a full modification of the policy as it continues to be effective in delivering its wider aims of supporting high quality communications, in tandem with requirements in the latest NPPF. In addition to this detailed planning policy, there is scope for Neighbourhood Plan policies to provide further detail to paragraph 113 of the NPPF around how 'equipment should be	No

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			sympathetically designed and camouflaged where appropriate'.	
Implementation and monitoring	Concern was raised by residential and commercial property sector about delays in the planning system.		The implementation and monitoring section, and monitoring framework (appendix 3) to be effective in the delivery of development set out in the Core Strategy, and is necessary to enable this. The issue highlighted is an operational one that falls outside the remit of the DMP DPD and will be considered with regard to planning service delivery.	No
	Concern by Council Tree Officers about the implementation, monitoring and enforcement of landscape planting and maintenance, in particular, tree planting and tree pits.		The Council will explore opportunities to identify resources to strengthen the enforcement of planning consents. This can be done outside the plan making process. Improved development monitoring of trees and landscaping will be discussed by the policy team, tree and enforcement officers. This would not necessitate changes to the DPD.	No
	Concern was raised about whether continued delivery of school travel plans are monitored and enforced.		This may be taken forward by Surrey County Council, and could be looked at further through monitoring the delivery of Core Strategy policy CS18. It would not necessitate an update to DMP DPD policy.	

Policy Area and gap highlighted	Analysis of issue
Sustainable construction, renewable and low carbon energy. Comments were received suggesting that existing policies addressing climate change could be strengthened, or new policy could be introduced to provide further detail under policy CS22: Sustainable Construction, and policy CS23: Renewable and low carbon energy generation. Further detail could be provided on heat networks and developer contributions towards district heat infrastructure; that key habitat areas or 'wild belts' be identified; and that details on the approach to cooling should be set out.	Both the NPPF and Core Strategy contain strong, strategic policies which continue to make an effective contribution to both mitigating and adapting the built environment to the impacts of climate change. The areas of improvement identified through developer and community feedback can be provided through improved planning guidance in support of policies CS22 and CS23. Together with allocating sufficient weight to climate change policy requirements in the development management process, the existing strategic policies, the forthcoming revised climate change supplementary planning guidance, and the climate neutral development checklist are considered to provide an effective framework for meeting local and national climate change objectives.
Specific policy on Biodiversity Net Gain	The Council awaits the development of Government policy on this issue. It is considered that, if necessary, this could be addressed by an SPD or guidance 'hooked' onto policies CS7 and/ or CS17
Opportunity to create a connected network of SANG sites reaching out from the Town Centre, as a part of the GI network.	Policy CS8 of the Core Strategy sets out the strategic policy framework for the provision of SANGs. The Site Allocations DPD has identified specific SANG land to support planned development up to 2027. Besides the allocated SANG land, other sites could come forward to be determined on their own merits. The Council has published a Thames Basin Heaths Special Protection Areas Avoidance Strategy to provide detailed guidance for the development of SANGs, including bespoke SANGs and how they could be connected. The Avoidance Strategy is being reviewed, and the concern raised will be considered as part of the preparation of the Avoidance Strategy. The Council has published detailed guidance (Woking 2050) which also includes an overview of the spatial distribution of green infrastructure. It is also preparing a Town Centre Masterplan which will set out how development in the Town Centre will be connected to green infrastructure as part of the GI network
Town Centre masterplan to support sustainable transport, including a priority pedestrian and cycle network, on street car club parking and sites for cycle hire hubs.	Preparatory work is underway on a town centre masterplan, which will include sustainable travel and movement as key considerations.
New policy to promote comprehensive and high quality redevelopment of office buildings, as opposed to Permitted Development Rights (PDR), by allowing a more flexible approach to internal floorspace standards and development density.	While this is an interesting idea that highlights a potential to enable a higher standard of development than PDR for office to residential conversions, it would need to be considered in light of possible policy review on employment uses, internal space standards (see detail above on DM9 and DM11) and appropriate densities in different character areas across the Borough, as part of a future review of the Core Strategy.

New policy to support micro- and small- businesses in the Borough. This idea takes as its basis a rapid growth in micro-enterprises in the Borough over the last decade, based on ONS UK Business Count 2021 data. It promotes a new policy to actively support	This would add further detail on delivery of CS15, which already provides specific policy support to small and medium sized enterprises, by encouraging a range of types and sizes of premises, including incubator units and managed workspaces. While ONS data shows rapid growth, the specific accommodation/ floorspace requirements of these sectors of the economy would need further evidence base studies to be undertaken to inform a future review of the Core Strategy, and
employment floorspace for these businesses, be it through spaces designed for smaller numbers of employees or co-working spaces. This could be delivered through a certain proportion of employment allocations being suitable for smaller (and micro)	would include collection of updated evidence with regard to the NPPF. This objective may also be taken forward through the Council's economic development strategy and related work areas.
enterprises.	

Conclusion

The review of the Development Management Policies DPD has had regard to revisions to the NPPF and other national policy, legislation and guidance that has been published since the adoption of the DPD in 2016, and also to the feedback from a broad range of internal and external users of the document, and other consultees.

Based on the above analysis, it is considered that the Development Management Policies DPD continues to be in general conformity with the provisions of the NPPF and helps to deliver on the Core Strategy and the Council's key priorities. All policies in the plan are achievable and effective including for the purpose of decision-making, and the DPD is considered to continue to provide an effective framework for delivery of development outlined in the Core Strategy. Consequently, there is no immediate need to modify any of the policies of the Development Management Policies DPD.

The Development Management Policies DPD has an in-built mechanism for its monitoring and review. The Council monitors the performance of each policy and report that in the Annual Monitoring Report, which is published by 31 December of each year. If future monitoring outcomes justify the need to modify the policies of the Development Management Policies DPD, the Council will take the necessary steps to modify it accordingly, and will provide a clear programme that will be reflected in the Local Development Scheme.