



The Planning Inspectorate

Report to Elmbridge Borough Council

by Nicholas Taylor BA (Hons) MRTPI

an Inspector appointed by the Secretary of State for Communities and Local Government

Date: 19th February 2015

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

**REPORT ON THE EXAMINATION INTO THE
ELMBRIDGE LOCAL PLAN: DEVELOPMENT MANAGEMENT PLAN**

Document submitted for examination on 2 June 2014

Examination hearings held on 27 and 28 August 2014

File Ref: PINS/K3605/429/5

Abbreviations Used in this Report

AA	Appropriate Assessment
AMR	Authority's Monitoring Report
CLG	Department for Communities and Local Government
CS	Core Strategy
ELP	Elmbridge Local Plan
EqIA	Equalities Impact Assessment
Framework	National Planning Policy Framework
LDS	Local Development Scheme
LP	Local Plan
MM	Main Modification
OAN	Objectively assessed need
PPG	Planning Practice Guidance
SA	Sustainability Appraisal
SCI	Statement of Community Involvement
SCS	Sustainable Community Strategy
SFRA	Strategic Flood Risk Assessment
SHMA	Strategic Housing Market Assessment
SIDPs	Settlement Investment and Development Plans
SPD	Supplementary Planning Document
SUDS	Sustainable Urban Drainage Schemes

Non-Technical Summary

This report concludes that the *Elmbridge Local Plan: Development Management Plan* provides an appropriate basis for the planning of the Borough, providing a number of modifications are made to the plan. Elmbridge Borough Council has specifically requested me to recommend any modifications necessary to enable the plan to be adopted. All of the modifications were proposed by the Council but where necessary I have amended detailed wording after considering the representations from other parties on these issues.

The Main Modifications can be summarised as follows:

- Clarification of the relationship between Policy DM10 and the Government's proposed 'nationally described housing space standard';
- Changes to Policy DM12 to achieve consistency with the *National Planning Policy Framework* (the Framework) and legislation regarding built heritage;
- Changes to various policies, regarding new and existing buildings and other forms of development in the Green Belt, to achieve clarity and consistency both internally and with the Framework;
- Clarification regarding 'areas of on-street parking stress';
- Various changes to a number of policies and explanatory paragraphs to achieve clarity and consistency with the Framework; and
- Amendments to the plan's provisions for monitoring, including the introduction of a new appendix containing additional, more focused indicators.

Introduction

1. This report contains my assessment of the *Elmbridge Local Plan: Development Management Plan* (DMP) in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended). It considers first whether the Plan's preparation has complied with the duty to co-operate, in recognition that there is no scope to remedy any failure in this regard. It then considers whether the Plan is sound and whether it is compliant with the legal requirements. The Framework (paragraph 182) makes clear that to be sound, a Local Plan (LP) should be positively prepared; justified; effective and consistent with national policy.
2. The starting point for the examination is the assumption that the local authority has submitted what it considers to be a sound plan. The basis for my examination is the submitted draft plan (June 2014), which is the same as the document published for consultation in February 2014.
3. My report deals with the Main Modifications that are needed to make the Plan sound and legally compliant and they are identified in bold in the report (**MM**). In accordance with section 20(7C) of the 2004 Act the Council requested that I should make any modifications needed to rectify matters that make the plan unsound/not legally compliant and thus incapable of being adopted. These Main Modifications are set out in the Appendix. It should be noted that the Council has proposed and may make additional modifications to improve clarity but these are not referred to in my report as they do not concern the soundness of the plan.
4. The Main Modifications that are necessary for soundness all relate to matters that were discussed at the Examination hearings. Following these discussions, the Council prepared a schedule of proposed Main Modifications and carried out sustainability appraisal. This schedule has been subject to public consultation for six weeks. I have taken account of the consultation responses in coming to my conclusions in this report and in this light I have made some amendments to the detailed wording of the Main Modifications. None of these amendments significantly alters the content of the modifications as published for consultation or undermines the participatory processes and sustainability appraisal that has been undertaken. Where necessary I have highlighted these amendments in the report.

Assessment of Duty to Co-operate

5. Section s20(5)(c) of the 2004 Act requires that I consider whether the Council complied with any duty imposed on them by section 33A of the 2004 Act in relation to the Plan's preparation.
6. The duty relates to strategic matters involving sustainable development or use of land with significant impact across administrative boundaries and/or involving a county matter in two-tier areas. The Council's statements¹ on the duty demonstrate significant constructive, active and on-going engagement on

¹ MD/EBC/004, MD/EBC/008 and OED/EBC/013

strategic matters with Surrey County Council, neighbouring local authorities in Surrey and Greater London and other relevant bodies, none of which have raised concerns about the matter. Additional information² from the Council confirms that a proportionate approach, given the DMP's content, has been taken with regard to three specific issues: flood risk, water supply and school provision, which are particularly relevant to the DMP. Therefore, I am satisfied that the duty has been complied with.

Assessment of Soundness

Preamble

7. *Planning Practice Guidance* (PPG) was introduced by the Government on 6 March 2014, replacing previous national planning guidance. This was before the submission of the DMP for examination but after the publication of the *Proposed Submission Development Management Plan* and part way through the period of Regulation 19³ consultation on it. I am satisfied that there has been adequate opportunity for the Council and interested parties to take account of PPG.
8. In September 2014, the Government published a *Housing Standards Review: Technical Consultation* which proposes, among other things, to introduce national space standards for residential accommodation. A statement of policy is currently awaited, subject to Parliamentary approval of amendments to the Building Act 1984 and the Planning and Energy Act 2008. A new 'nationally described space standard' will be published, alongside amendments to the Building Regulations and associated Approved Documents, and will come into effect 6 months later, in the autumn of 2015. My report takes account of the government's intentions and timetable.

Main Issues

9. Taking account of all the representations, written evidence and the discussions that took place at the examination hearings I have identified five main issues upon which the soundness of the plan depends.

Issue 1 – Whether the overall approach to sustainable development, including flood risk, natural resources, access and parking is sound (Policies DM1, DM2, DM7, DM13 and DM21)?

10. Policy DM1 sets out the DMP's overarching approach in terms of a presumption in favour of sustainable development, including working proactively with applicants. In doing so, it is positively prepared, consistent with the Framework, particularly paragraph 14, and closely follows a model policy which has been used in other development plans. A detailed diagram at the beginning of the DMP clearly explains the relationship between the DMP, the adopted *Elmbridge Core Strategy* (CS) and the forthcoming *Settlement Investment and Development Plans* (SIDPs) which, together, will comprise the *Elmbridge Local Plan* (ELP). The diagram also identifies various existing and

² HD/EBC/002b

³ The Town and Country Planning (Local Planning)(England) Regulations 2012

proposed *Supplementary Planning Documents* (SPDs), other guidance and supporting documents. All in all, the policy is sound and sets the appropriate tone for the remaining policies.

11. Flood risk is a significant issue within Elmbridge. The Borough borders on a considerable length of the River Thames and the Rivers Wey, Mole and Rythe flow through it. Extensive areas of the Borough are identified in the SFRA, and on the proposals Map, as being at risk of flooding. The DMP does not contain a single, detailed policy on flood risk, although several policies impinge on it. The Council proposes to rely primarily on CS Policy CS26, which sets out fairly detailed criteria, referring to the *Strategic Flood Risk Assessment* (SFRA), national guidance and other local guidance, and to prepare a *Flood Risk SPD*.
12. I acknowledge the concern which flood risk generates among riverside communities and understand their desire for very clear, detailed and strict guidelines for development. However, some of the expressed concerns specifically relating to the DMP are more to do with implementation of existing policies than deficiencies in available detailed policy and guidance. The ELP is intended to be read across its component parts. Policy CS26, the Framework and PPG (which has superseded national policy referred to in the CS) provide, between them, sufficient coverage at national and development plan level. It is acceptable to provide more detailed local guidance in the SFRA, publication of the updated version of which is imminent, and in the proposed *Flood Risk SPD*, which, according to the current *Local Development Scheme 2014-2017*, is due to be published in draft in early 2016 but which the Council says it may bring forward. It would be impractical, and not necessarily appropriate, to attempt to include such detail in the DMP. The Environment Agency has endorsed the Council's approach as has Surrey CC, which is the lead local flood authority and is responsible for approving sustainable urban drainage schemes (SUDS). Under the circumstances, therefore, the absence of a specific, detailed policy on flood risk does not render the DMP unsound.
13. Policy DM2 is intended to provide a Borough-wide perspective on a number of aspects of design and amenity. As submitted, part (c) is unclear as to which aspects of sustainable design and construction, including energy and water consumption, it covers. It also implies that the wide-ranging sustainable design and construction guidance in Chapter 5 of the *Design and Character SPD* is to be translated into a "requirement" of all new development. These shortcomings are addressed in **MM2**. In addition, **MM3** adds a reference in paragraph 2.8 to development adjoining the Green Belt, replacing an erroneous reference in policy DM17.
14. Policy DM7 addresses access and parking, with considerable detail relating to the *Elmbridge Parking Standards* and the *Surrey County Council Vehicular and Cycling Guidance* helpfully included within an appendix to the DMP. Overall, subject to the exception referred to below, the policy (including Appendix) is consistent with the Framework, locally distinctive and sound in its approach, including the application of both maximum and minimum standards in certain circumstances and in reference to electric vehicle charging points. **MM18** and **MM19** are, however, necessary in order to provide, within paragraph 2.25 and Appendix 1 respectively, appropriate clarity together with flexibility in the approach to defining "areas of on-street parking stress".

Issue 2 – Whether the approach to housing development is sound (Policy DM10)?

Housing need and supply

15. Paragraph 47 of the Framework aims to significantly boost the supply of housing and requires local authorities to use their evidence base to ensure that their LPs meet the full, objectively assessed needs (OAN) for housing within their housing market area, as far as is consistent with the policies in the Framework.
16. In Elmbridge, the CS includes strategic policies for housing and it is intended that the forthcoming SIDPs will allocate individual sites. The Council's approach to preparation of a portfolio of development plan documents is consistent with relevant legislation and Regulations and national policy and guidance. Thus the role of the DMP is limited to setting out, primarily in Policy DM10, policy regarding specific aspects of housing development.
17. Representors have questioned whether the level of housing provision set out in the CS, which was adopted in 2011, still represents the Borough's OAN, taking account of recent household projections and other factors. Moreover, it is argued that the current level of supply falls short of five years, as required by the Framework, and that, rather than progress the DMP and the SIDPs, attention and resources should be focused on a fundamental review of the *East Surrey Strategic Housing Market Assessment (SHMA)* and the CS.
18. The DMP is not concerned with setting the overall level of housing development, which is the role of the CS, or with allocating sites, which will be identified through the SIDPs. Consequently, in order to assess the soundness of the DMP, it is not necessary to address in detail the question of whether the Borough's current OAN has been correctly calculated. The question of whether, at the present time, the Council can demonstrate a five year supply of deliverable housing sites is also irrelevant to the soundness of the DMP. The Framework, at paragraphs 14 and 49, addresses situations in which such a supply cannot be demonstrated.
19. Any change to the proposed housing target would need to be brought forward through a fundamental review of the ELP. The Council has recently decided to suspend preparation of the SIDPs and to review the evidence base supporting the housing targets set within the CS. At the time of writing, the review has not been completed and the Council has not determined whether it will continue with preparation of the SIDPs or commence an entirely new ELP. However, on this matter, there is no strong evidence to indicate that delaying adoption of the DMP would assist the supply of housing in sustainable locations or that Policy DM10, subject to the amendments set out below, would be an impediment to it.

Policy DM10

20. Policy DM10 broadly seeks to ensure the efficient use of land and the optimum mix of housing, consistent with local design, character and other considerations, in accordance with CS and Framework objectives. Part (a) strikes a reasonable balance between influencing the type and mix of housing on larger sites, whilst providing flexibility and not impeding viability, particularly on smaller sites of less than 0.3 hectares. Part (d) sets out appropriate criteria for the development of garden land.
21. Part (c) concerns living standards for residents of new housing or conversions of larger units. It sets out minimum internal space standards which are similar to those in force in the *London Plan* and to standards put forward for consultation by the Government⁴.
22. The Inspector examining the Wokingham LP⁵ considered that, in principle, there is nothing to suggest that a policy requirement for minimum internal space standards is unsound and, given a number of factors, I see no reason to disagree in the case of the DMP. The first is that the Framework⁶ requires planning authorities to always seek to secure high quality design and a good standard of amenity for all existing and future occupants, through plans which provide a practical framework within which decisions can be made with a high degree of predictability and efficiency.
23. The second factor is the Government's clear intention, set out in the *Housing Standards Review*, to provide for nationally described space standards which would be referenced in local plan policies, where justified with regard to need, viability, affordability and timing. The Council has provided evidence⁷ to specifically address these matters. It shows that typical house prices in the Borough are above the general Surrey and South East levels and the strong housing market can, as in London, lead to pressure to develop very small units which in a minority of cases provide inadequate accommodation. On the basis of all the evidence, I am satisfied that the application of the standards as proposed, subject to the modifications described below, would not adversely affect the viability, affordability or timing of new housing within the Borough. Thus, there would be no conflict with paragraphs 174 and 177 of the Framework, relating to the cumulative impact of policies and local standards on viability.
24. However, whilst at the present time the Government's space standard has not yet come into effect, when it does it will supersede the relevant part of Policy DM10. Accordingly, variations to part (c) of the policy and to explanatory paragraph 2.44 are required. Until then, whilst developers and occupiers would have a degree of choice regarding number of bedrooms in relation to

⁴ *Housing Standards Review: Technical Consultation*, September 2014, and *Nationally Described Space Standard: Technical Requirements – Consultation Draft*, September 2014; both CLG

⁵ Wokingham Borough Council's Managing Development Delivery Local Plan, Inspector's Report, January 2014

⁶ Paragraph 17

⁷ *Space Standards Paper* (PH/EBC/006)

bedspaces, in the interests of flexibility, an amendment is also required in order to make clear that sub-standard developments which nevertheless offer purpose-built, innovative and unique accommodation to address a specific need will be considered on their merits. Thus, **MM4** and **MM5** ensure that part (c), together with paragraph 2.44, is effective and consistent with national policy.

25. A further amendment, **MM6**, to paragraph 2.47 is necessary to ensure consistency with policy for ancillary accommodation within the Green Belt, consequent to changes to Policy DM18.

Issue 3 – Whether the policy concerning Heritage (Policy DM12) is sound?

26. Policy DM12 concerns a number of aspects of historic heritage. Read together, policies DM2, DM3, DM4 and DM12 provide a comprehensive treatment of the topic. However, whilst accepting that it is not practicable or desirable within a LP to attempt to precisely replicate the complete wording of legislation and national policy, Policy DM12 has a number of shortcomings relating to effectiveness and consistency. These are addressed by the following substantial revisions contained in **MM7**.
27. Part (a)ii is revised to accurately reflect the duties with regard to listed buildings and their curtilages set out in Sections 16(2) and 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990.
28. Parts (a)iv and v and (b)v are amended to accurately reflect the Framework's approach to "substantial harm" and "less than substantial harm" of designated heritage assets and to balancing those harms against public benefits. The inappropriate reference in part (b) to the Council's *Conservation Area Character Appraisals and Management Plans*, which are not part of the development plan, is also amended.
29. Part (f) refers to locally listed buildings and other identified heritage assets, which is inconsistent with the term "non-designated" heritage assets, as used in paragraph 135 of the Framework. The rewording resolves this and other issues of consistency and clarity.

Issue 4 – Whether policies for Green Belt and open space (Policies DM17, DM18, DM19 and DM20) are sound?

Policy DM17 – Green Belt (development of new buildings)

30. National policy for Green Belts, as set out in the Framework and refined in its interpretation by the courts, is precise in many respects. Several MMs (MM8, MM9 and MM10) were proposed, providing a package of changes to Policy DM17 and paragraphs 2.76/2.77 and 2.78 respectively, in order to address shortcomings in consistency and effectiveness. However, a number of representations on the proposed MMs argued that, even with them, certain aspects of the policy and explanatory text remained unclear and inconsistent with the Framework. Whilst accepting that it is reasonable for the plan to focus on certain locally significant types of development and that it is unnecessary to precisely replicate the complete content of the Framework, I am persuaded that further limited amendments to the detailed wording of

MM8 and MM9 are required in order to ensure soundness. These are denoted by the suffix 'A'.

31. **MM8A** amends part (a) of the policy to remove inconsistency with the Framework in that it confuses "purposes" of the Green Belt with its "fundamental aims". It also resolves a lack of clarity in part (b) about which uses and types of development are covered and removes superfluous wording. A requirement, in part (c), for development to improve the openness of the Green Belt, which would be inconsistent with the requirements of paragraph 89 of the Framework, is removed. The additional amendments further clarify the relationship between the policy and paragraphs 89 and 90 of the Framework, with regard to the definition of inappropriate development, and, within part (c), resolve a conflict regarding dispersal of development across sites. **MM9A** resolves the same inconsistencies, whilst also clarifying the text, within revised explanatory paragraphs 2.76 and 2.77.
32. Part (d) is intended to ensure that development outside the Green Belt, but adjoining or clearly visible from it, achieves a satisfactory visual transition between urban and open land. Whilst the aim is sensible, it is confusing in this instance to include in a Green Belt policy a requirement relating to land outside it. The circumstances differ from policies DM12 and DM13, which respectively relate to views in or out of a conservation area and riverside locations. The underlying aim is addressed in Policy DM2a and in policy DM6a. Accordingly, **MM8A** also deletes part (d) of the policy and **MM10** deletes the related paragraph 2.78. **MM3**, referred to above, adds suitable reference in paragraph 2.8, supporting policy DM2.
33. With the recommended changes, Policy DM17, read alongside other policies in the DMP and CS and their explanatory text, together with the Framework, provides an appropriate basis for consideration of proposals for new buildings in the Green Belt, including schools, and is sound. This is not undermined by the Council's deliberate omission of the Green Belt from the individual, area companion guides which form part of the *Design and Character SPD*.

Policy DM18 – Green Belt (development of existing buildings)

34. **MM11** and **MM12** are necessary to make parts (a) and (b) of the policy and the supporting paragraph 2.80 clear and effective, by including a suitable reference to the sensitivity of open and prominent locations within the Green Belt. The policy sets out differing percentage limits which help to interpret the Framework's terms 'disproportionate' additions to buildings, including cumulative extensions, and 'not materially larger' replacement of buildings. These limits are based on previous local interpretation of the Framework, refined through public consultation and are not, therefore, unduly inflexible or arbitrary. Consequently, the soundness of the policy is not undermined.
35. Part (d) of the policy concerns ancillary buildings. In distinguishing between ancillary buildings within 5 metres of the main building and those further away, it merely clarifies the Council's approach in such instances and is not unnecessarily arbitrary or onerous. However, the inclusion of new ancillary buildings within DM18, which primarily concerns extensions, alterations and replacements, creates confusion between this policy and Policies DM17 and DM10e and the Framework. **MM11** and **MM13** resolve the problem with

regard to the policy and paragraph 2.82, respectively, in order to make the policy clear, effective and consistent with national policy.

Policies DM19 and DM20 – Horse-related development and Open Space and views

36. Amendments to Policy DM19 part (a), through **MM14**, and to supporting paragraph 2.86, through **MM15**, correct the interpretation of national Green Belt policy regarding equestrian uses.
37. Part (d) of Policy DM19 introduces a requirement for new developments to be designed to offer a high level of equine welfare, which relates to compliance with non-planning legislation. As such, it is unsound. **MM14**, which deletes part (d) and **MM16**, which amends paragraph 2.88 accordingly, rectify the shortcoming.
38. The approach of Policy DM20 towards Local Green Space and other areas of green space is consistent with the Framework, in particular its paragraphs 73 – 78. However, whilst part (c), concerning strategic views and key landmarks, is satisfactory in itself, confusion arises from the attempt, in explanatory paragraph 2.90, to explain that part (c) applies equally to the Green Belt and the remainder of the Borough, whereas parts (a) and (b) do not apply to the Green Belt. **MM17** removes the confusion within a partially new paragraph 2.91.

Issue 5 – Whether the approach to Monitoring is sound?

39. To be sound, the DMP must be capable of being effectively delivered, requiring effective monitoring. The plan contains an introductory chapter on monitoring, setting out the Council's holistic approach, involving monitoring of the several components of the LP and its supporting documents and culminating in reporting the results in the Authority's Monitoring Report (AMR), which is generally to be commended. To address a need for the monitoring to be more focussed towards the DMP, the Council proposes a number of significant amendments to the chapter, including a new Appendix 6 setting out indicators more specific to the DMP policies. **MM1** consolidates various amendments, including the new Appendix 6, but also refining the indicators to ensure that they are relevant, measurable and realistic. With those changes, the approach to monitoring the DMP is sound.

Assessment of Legal Compliance

40. My examination of the compliance of the Plan with the legal requirements is summarised in the table below. I conclude that the Plan meets them all.

LEGAL REQUIREMENTS	
Local Development Scheme (LDS)	The DMP is identified within the Council's latest LDS 2014-2017, published in October 2014, which sets out an expected adoption date of late 2014. The DMP's content and timing are generally compliant with the LDS.
Statement of Community Involvement (SCI) and	The SCI was adopted in February 2013 and consultation has been compliant with the

relevant regulations	requirements therein, including the consultation on the post-submission proposed Main Modifications.
Sustainability Appraisal (SA)	SA has been carried out, including of MMs, and is adequate.
Appropriate Assessment (AA)	The <i>Habitats Regulations AA Screening Report</i> (2013) concludes that the DMP will not have any significant impacts beyond those identified in the <i>Habitats Regulations Assessment (HRA)</i> for the CS.
National Policy	The DMP complies with national policy except where indicated and main modifications are recommended.
Sustainable Community Strategy (SCS)	Satisfactory regard has been paid to the <i>Elmbridge Sustainable Community Strategy 2006-2015</i> .
Public Sector Equality Duty (PSED)	Having regard to the EqIA (May 2014), the DMP complies with the Duty.
2004 Act (as amended) and 2012 Regulations.	The DMP complies with the Act and the Regulations.

Overall Conclusion and Recommendation

41. The Plan has a number of deficiencies in relation to soundness, for the reasons set out above, which mean that I recommend non-adoption of it as submitted, in accordance with Section 20(7A) of the 2004 Act.
42. The Council has requested that I recommend Main Modifications to make the Plan sound and/or legally compliant and capable of adoption. Subject to the recommended Main Modifications set out in the Appendix, I conclude that the *Elmbridge Local Plan: Development Management Plan* satisfies the requirements of Section 20(5) of the 2004 Act and meets the criteria for soundness in the *National Planning Policy Framework*.

Nicholas Taylor

Inspector

This report is accompanied by the Appendix containing the Main Modifications

Appendix – Main Modifications

The modifications below are expressed in the conventional form of underlining indicating text which will be added or moved within the final version of the document and ~~striketrough~~ to indicate where original text will be deleted. The page and paragraph numbers relate to the submission version of the plan and do not necessarily take account of any Minor Amendments which the Council may make.

Ref	Policy/ Parag- raph	Page	Main Modification
MM1	Para 1.17	8	<p>1.17 As the Development Management Plan policies support the Core Strategy Objectives, they will be monitored using the same indicators within the Objective Led Performance Framework. <u>However, in addition to these indicators the Council will add the indicators set out in Appendix 6 to ensure more specific monitoring of the Development Management Plan is included in the Council's existing approach to monitoring.</u> Where necessary the Council will <u>also</u> create new indicators and delete obsolete ones to meet changing circumstances, for example to address changes to national policy. Under the provisions of the Localism Act 2011, changes to monitoring requirements have given local planning authorities more scope to decide what is included within their monitoring information. As well as monitoring the outcome of policies individually, the AMR will also assess the effects of policies holistically to assess whether or not they are proving effective at delivering sustainable development. Where any negative effects are identified, remedial action will be suggested.</p> <p>(Table of additional indicators and introductory text will be inserted as a new Appendix 6, set out at the end of this appendix.)</p>
MM2	Policy DM2, part c	11	<p>c. Proposals should take account of landform, layout, building orientation, massing and landscape to minimise energy consumption. incorporating sustainable design and construction requirements as set out in the sustainability section of Chapter 5 of the Design and Character SPD.</p> <p>Insert footnote linking to the word 'consumption' as follows:</p> <p><u>Further advice on sustainable design and construction is set out in the Sustainability chapter of the Design and Character SPD</u></p>

MM3	Para 2.8	13	<p>2.8 This policy is intended to provide the basis for assessing design and amenity in a universal manner. Development proposals will be expected to take account of other relevant policies that address specific issues including access and parking (with particular reference to policy DM7), flooding, landscape and trees. <u>Given the significant amount of Green Belt within Elmbridge, proposals should take into account the character of any open land adjoining the site. By applying good design principles, development can form an attractive transition, ensuring that more prominent elements of the building are located furthest from the Green Belt boundary and ensuring that softer landscape features such as gardens are located closest to it.</u></p>
MM4	Policy DM10 part c	32	<p>c. Living Standards</p> <p>Proposals for new housing development or the conversion of larger dwellings into smaller units will be expected to offer an appropriate standard of living, internally and externally. Minimum space standards will be applied to all new housing development (including conversions) in line with the table below, <u>unless these are superseded by nationally applicable standards, in which case, the nationally described space standards will apply.</u> Where developments come forward that are <u>smaller than the space standards but offer purpose built, innovative and unique accommodation to address a specific need the Council will consider such proposals on their merits.</u> Residential accommodation should offer residents an appropriate level of light, outlook (particularly when accommodation is lit solely by roof lights) and amenity, including gardens and open space, commensurate with the type and location of housing proposed.</p> <p>Insert footnote linking to the word 'standards' as follows:</p> <p><u>The Space Standards set out a minimum requirement of provision for C3 use class residential properties only. These are intended to be a minimum standard which developers should exceed where possible. The intended number of occupants should be indicated on the planning application form.</u></p>
MM5	Para 2.44	35	<p>2.44 <u>Following a Housing Standards Review, the Government has stated its intention, subject to legislation, to introduce a national internal space standard for dwellings. The Government's aim is to make it easier to bring forward much needed new housing, whilst improving quality and safeguarding environmental protections and access for disabled</u></p>

		<p><u>people. The national internal space standard is intended to be referenced in planning policies, where justified by need and subject to viability. Within the Borough, In considering proposals for new development, the Council proposes applying minimum internal space standards¹⁵. This is a new provision in the Elmbridge Local Plan due to there have been concerns that some developments have been proposed that are not large enough to offer the future occupant(s) a decent standard of living accommodation or to provide lifetime homes in accordance with Core Strategy policies CS17 - Local Character, Density and Design and CS20 - Older People, in order to meet Objective 13¹⁶.</u></p> <p>2.45 Particularly when the housing market is buoyant, the Borough can experience pressure on even the smallest of sites for residential units, such as the conversion of storerooms behind or above retail premises or the subdivision of larger units to form smaller flats or bedsits. Although the creation of smaller units is often welcomed, there is also a responsibility to ensure that such housing is not excessively small to result in a poor standard of living accommodation for its occupants. <u>All proposals for residential development will be considered in the light of Policy DM10c and the internal space standards set out in the table alongside it. The standards are consistent with those used as Elmbridge's minimum floorspace requirements for affordable housing (see the Developer Contributions SPD). The standards in the table, which are generally similar to those set out in the Government's consultation (Housing Standards Review - Technical Consultation, September 2014), will be applied until new nationally described space standards come into force. When and if such a national space standard comes into force, it will supersede those set out in the table. The Council is also aware of companies and organisations specialising in the provision of innovative, well designed residential units which would not be compliant with the space standards. Whilst such units are smaller than ideally would be required, it is acknowledged that such products are designed to offer high quality living spaces to meet specific needs and demands.</u></p> <p>Delete footnote 15.</p> <p>Proposed space standards to be consistent with those used as Elmbridge's minimum floorspace requirements for affordable housing (see the Developer Contributions SPD) and by other local planning authorities, such as the standards contained in the London Plan 2011.</p>
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MM6	Para 2.47	35	<p>2.47 The Council is mindful that housing development needs to respond flexibly to the changing needs of families by accommodating additional relatives or staff. The policy on ancillary accommodation aims to meet such needs whilst recognising that separate buildings within the curtilage of larger dwellings can have a negative impact on the character of the area and may not have suitable amenity space or access arrangements to be used as an independent house. Conditions may therefore be appropriate in order to set the parameters for the occupation of the extension or buildings and to retain control where appropriate. <u>Proposals for ancillary accommodation within the Green Belt would also be considered against Policy DM18.</u></p>
MM7	DM12	40, 41, 42	<p>Planning permission will be granted for developments that protect, conserve and enhance the Borough's historic environment. This includes the following heritage assets²²:</p> <ul style="list-style-type: none"> • Listed Buildings and their settings • Conservation Areas and their settings • Parks and Gardens of Special Historic Interest and their settings • Scheduled Monuments and their settings • Areas of High Archaeological Potential and County Sites of Archaeological Importance (CSAIs) • Locally Listed Buildings and other identified or potential assets (including non-designated locally significant assets identified in the local lists compiled by the Council). <p>a. Listed Buildings</p> <ol style="list-style-type: none"> i. The Council will encourage appropriate development to maintain and restore Listed Buildings, particularly those identified as being most at risk. ii. Development to, or within the curtilage or vicinity of, a listed building or structure should preserve or enhance its <u>setting and any features of special interest architectural or historical interest which it possesses and its setting.</u> iii. A change of use of part, or the whole, of a Listed Building will be approved provided that its setting, character and features of special architectural or historic interest would be preserved or enhanced.

			<p>Consideration will also be given to the long-term preservation that might be secured through a more viable use.</p> <p>iv. Partial demolition of a Listed Building, including curtilage buildings, will be resisted unless the character or appearance of the listed building and its setting will be improved. <u>Development which would cause substantial harm to or loss of a listed building (including curtilage buildings), such as total or partial demolition, will be permitted only in exceptional circumstances. In such cases, consideration will be given to the asset's significance²³. Applicants will need to clearly demonstrate that either:</u></p> <ol style="list-style-type: none"> 1. <u>There are substantial public benefits outweighing any harm or loss; or</u> 2. <u>All of the following apply:</u> <ul style="list-style-type: none"> • <u>the nature of the listed building prevents all reasonable use of the site;</u> • <u>no viable use of the listed building can be found in the medium term through appropriate marketing that will enable its conservation;</u> • <u>it can be demonstrated that charitable or public funding/ownership is not available to enable its conservation;</u> • <u>any harm or loss is outweighed by the benefit of bringing the site back into use.</u> <p>v. Total demolition of a Listed Building will be refused.</p> <p>b. Conservation Areas</p> <p>i. Development proposals should take full account of the Council's Conservation Area Character Appraisals and Management Plans for the relevant area.</p> <ol style="list-style-type: none"> i. Proposals for all new development, including alterations and extensions to buildings, their re-use and the incorporation of energy efficiency and renewable energy technologies, must have a sensitive and appropriate response to context and good attention to detail. ii. Development within or affecting the setting of a
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			<p>conservation area, including views in or out, should preserve or enhance the character and appearance of the area, taking account of the streetscape, plot and frontage sizes, materials and relationships between existing buildings and spaces.</p> <p>iii. Open spaces, trees and other hard and soft landscape features important to the character or appearance of the area should be retained or be in keeping with the character of the area²⁴.</p> <p>iv. Demolition of buildings and/or structures will be granted consent provided that the building and/or structure to be demolished makes no material contribution to the character or appearance of the conservation area and that permission has been granted for their sensitive replacement or redevelopment. <u>Proposals to demolish buildings and/or structures will be assessed against their contribution to the significance of the conservation area as a heritage asset. Where substantial harm would be caused to a conservation area's significance, the proposal will be resisted unless exceptional circumstances, including substantial public benefits outweighing any harm to the conservation area, can be demonstrated. Where the harm would be less than substantial, it will be weighed against any public benefits of the proposal, including securing optimum viable use of the heritage asset and whether it would enhance or better reveal the significance of the conservation area.</u></p> <p>c. Parks and Gardens of Special Historic Interest</p> <p>i. Parks and gardens identified as being of special historic interest, including landscape features and buildings, and their setting, will be protected and their sensitive restoration encouraged.</p> <p>ii. Any proposed development within or conspicuous from a historic park or garden will be permitted provided that it does not detract from the asset.</p> <p>d. Scheduled Monuments and County Sites of Archaeological Interest (CSAIs)</p> <p>i. Development that adversely affects the physical survival, setting or overall heritage significance of any element of a Scheduled Monument or CSAI will be resisted.</p> <p>ii. Any new development should be sensitive to these</p>
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			<p>criteria and positively act to enhance the monument or CSAI overall and ensure its continued survival.</p> <p>e. Areas of High Archaeological Potential²³²⁵</p> <p>i. Proposals for development should take account of the likelihood of heritage assets with archaeological significance being present on the site, provide for positive measures to assess the significance of any such assets, and enhance understanding of their value.</p> <p>f. Locally Listed Buildings and other identified <u>non-designated</u> heritage assets</p> <p>i. The Council will seek to retain these, where possible, and will assess proposals which would directly or indirectly impact on them in the light of their significance and the degree of harm or loss, if any, which would be caused. ensuring new development does not harm the character, appearance or setting of the building or asset. Where harm or loss to a heritage asset is considered by the Council to be justified by the scale and nature of public benefits of the proposed development, developers will be required to record and advance understanding of the significance of the asset to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence publicly accessible.</p> <p>Add new footnotes:</p> <p><u>²³In the case of grade I and II* listed building any development resulting in substantial harm will be wholly exceptional. In the case of all listed buildings, where the harm would be less than substantial, it will be weighed against the public benefits of the proposal, including securing its optimum viable use.</u></p> <p><u>²⁴ More detailed guidance can be found in the Conservation Area Character Appraisal and Management Plan for the relevant area.</u></p>
MM8A	Policy DM17	53	<p>a. The Green Belt boundary is defined on the Policies Map²⁸. In order to uphold the purposes <u>fundamental aims</u> of the Green Belt, to prevent</p>

			<p>urban sprawl and to keep land within its designation permanently open, inappropriate development will not be approved unless the applicant can demonstrate very special circumstances that will clearly outweigh the harm. <u>Inappropriate development will be defined in accordance with the National Planning Policy Framework, including the following provisions.</u></p> <p>b. Built development for outdoor sport, recreation and <u>cemeteries</u> other appropriate uses²⁹ will need to demonstrate that the building's function is ancillary and appropriate to the use and that it would not be practical to re-use or adapt any existing buildings on the site. Proposals should be sited and designed to minimise the impact on the openness of the Green Belt and should include a high quality landscape scheme. The development will be expected to comply with other policies that prevent an adverse impact on the environment and the community.</p> <p>c. Proposals for the limited infilling or the partial or complete redevelopment of previously developed sites will be considered in light of the size, height, type, layout and impact of existing buildings, structures and hard standing, <u>together with the degree of dispersal throughout the site of existing and proposed development.</u> Support will be given to proposals that limit the dispersal of development throughout the site or can demonstrate that the openness of the Green Belt will be improved.</p> <p>d. New development of land adjoining or clearly visible from the Green Belt should respond to its setting and the character of the area, ensuring that buildings and landscape schemes are designed to create an appropriate transition between urban and open land.</p>
MM9A	Paras 2.76 and 2.77	54	<p>2.76 Some development is regarded as 'appropriate' within the Green Belt and this is limited to that which supports uses which keep the land open and are consistent with the purpose it serves, including agriculture, forestry, cemeteries, and outdoor sport and recreation. Other forms of development that are also 'not inappropriate' are listed in the Framework. The Council acknowledges the appropriateness of such proposals and plans to positively enhance the beneficial use of the Green Belt but will require buildings to be genuinely ancillary and appropriate to the sustainable operation of the appropriate use in order to minimise</p>

		<p>development wherever possible and therefore preserve the openness of the Green Belt. Similarly, applicants will be expected to consider whether any existing buildings could be re-used sustainably rather than proposing a new development that may have a greater impact on the Green Belt and the environment, and to include measures that may serve to mitigate the effect on the character of the area, such as a high standard of design and landscape DM17(b) and (c) consider particular types of built development which are not inappropriate within the Green Belt, provided that they preserve its openness and do not conflict with its purposes. Other types of development which may potentially not be inappropriate within the Green Belt will be considered against national policy, particularly paragraphs 89 and 90 of the National Planning Policy Framework. Proposals for extension, alteration and replacement of buildings will be considered under DM18-Green Belt (development of existing buildings).</p> <p><u>2.77 The Council acknowledges that, in certain circumstances, new buildings are not inappropriate in the Green Belt. Where possible, new development should positively enhance the beneficial use of the Green Belt and be genuinely ancillary and appropriate in scale form and function to the sustainable operation of the use in order to minimise development and preserve the openness of the Green Belt. Similarly, applicants will be expected to consider whether any existing buildings could be re-used sustainably rather than proposing a new development that may have a greater impact on the Green Belt and the environment, and to include measures that may serve to mitigate the effect on the character of the area, such as a high standard of design and landscape. The Framework also allows for the limited infilling or the partial or complete redevelopment of previously developed land and does not require these to be formally identified in order to benefit from the 'exception' to inappropriate development for new buildings. Consideration will be given on a case by case basis, recognising that new development should not have a greater impact on the openness of the Green Belt. As such, careful assessment of the impact of existing buildings and structures in comparison to new development is required. For example, an existing area of hardstanding can be regarded as 'development' but its impact on openness is significantly less than a proposed building. Applicants are encouraged to take the opportunity to make improvements to the openness of the green Belt where possible, which could include focusing development in a less conspicuous or open part of the site or removing a sprawl of buildings in favour of a single, cohesive development that leaves the</u></p>
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			remainder of the site open.
MM10	Para 2.78		<p>Delete paragraph 2.78 and amend paragraph 2.8 accordingly (see MM3).</p> <p>2.78 The policy also refers to land adjoining the Green Belt but not within it, recognising that development in close proximity to its boundary could have just as significant an effect upon it. By applying good design principles, development can form an attractive transition, ensuring that more prominent elements of the building are located furthest from the Green Belt boundary and ensuring that softer landscape features such as gardens are located closest to it.</p>
MM11	DM18	56, 57	<p>a. Extensions and alterations to a building will be permitted provided they do not result in disproportionate additions over and above the size of the original building, either individually or cumulatively. Support will be given to proposals that do not have a materially greater impact on the openness of the Green Belt and, in particular:</p> <ul style="list-style-type: none"> i. Are well designed to respond to the context of the site and the character of the area, <u>taking into account the particular visual sensitivity of open and prominent locations,</u> ii. Do not result in an increase beyond 25% in volume and 25% in footprint³¹ , and iii. Do not materially increase the overall height of the building. <p>b. The replacement of a building in the same use will be permitted provided that the new building is not materially larger than the one it replaces. Support will be given to proposals that do not have a materially greater impact on the openness of the Green Belt and, in particular:</p> <ul style="list-style-type: none"> i. Are well designed to respond to the context of the site and the character of the area, <u>taking into account the particular visual sensitivity of open and prominent locations,</u> ii. Do not result in an increase beyond 10% in volume and 10% in footprint³² , iii. Do not materially increase the overall height of the building, and iv. Are sited in the same position as the existing building or in a preferable position within the site

			<p>to maximise the openness of the Green Belt.</p> <p>c. The volume and footprint of existing buildings to be demolished within the site may be included in the increase in volume and footprint under (a) and (b) above, taking into account their size, permanence, design and proximity to the building to be extended or replaced. Conditions may be used to remove permitted development rights for further outbuildings and extensions.</p> <p>d. Proposals to erect, extend or replace an ancillary building within 5 metres of the main building will be treated as an extension to it <u>the main building</u>, under (a) above. The extension or replacement of an ancillary building sited more than 5 metres from the main building will be considered under either (a) or (b) above, <u>as appropriate</u>, as a building in its own right. Permission will not be granted for new ancillary buildings sited more than 5 metres from the main building unless it is for an appropriate use in the Green Belt or very special circumstances can be demonstrated that would clearly outweigh any harm to the openness. Proposals to erect new ancillary buildings sited more than 5 metres from the main building, which would not replace existing buildings, will be assessed against the relevant policies relating to new free-standing buildings within the Green Belt.</p> <p>e. Proposals for a basement will be permitted provided it is wholly subterranean, does not generate significant additional activity on the site as a whole, does not exceed the footprint of the existing building (including as extended or replaced) and is served only by discreet light wells, ventilation systems or means of escape³³. Basements that do not comply with these provisions will be regarded as contributing to the increase in volume and footprint under (a) and (b) above.</p> <p>Amend footnotes 31 and 32 to both read as follows:</p> <p>To be calculated based on external dimensions. Figures lower than the maximum percentage permitted under this policy may be sought in open and prominent locations within the Green Belt.</p> <p>New footnote</p> <p><u>³³ This does not preclude features such as internal connections to the rest of the house.</u></p>
MM12	Para 2.80	57	2.80 There will be instances where perhaps a significantly lower figure will be more appropriate, based on the specifics of the site, <u>such as in open and</u>

			<p><u>prominent locations and where environmental constraints are a factor, including flood risk, but the percentages offer clear parameters within which new developments can be designed to preserve the openness of the Green Belt and the character of the area.</u></p>
MM13	Para 2.82	58	<p>2.82 This policy gives specific guidance on how ancillary buildings will be treated in assessing new proposals. This is to give greater clarity for applicants which could result in more focus on the quality and design of the proposal rather than lengthy discussion on other matters. The distance of 5 metres within which an ancillary building will be treated as being part of the main building has been specified as a dimension that is commonly used to imply contiguousness of development for Green Belt purposes and stems from its use in earlier versions of the General Permitted Development Order in respect of outbuildings to dwelling houses. <u>Proposals for new free-standing ancillary buildings sited more than 5 metres from the main building would be considered against policies DM17, DM18 and national policy relating to new buildings in the Green Belt, rather than extensions to existing buildings, due the separation between the built forms and the resulting lack of contiguousness. Ancillary buildings in any location would also need to satisfy part e of policy DM10-Housing.</u></p>
MM14	DM19 Part a)	59	<p>a. New development associated with appropriate horse-related activities will be permitted, including within the Green Belt where provided it complies with policy, if it would respect the character and amenity of the area without resulting in undue pressure on local infrastructure, nature conservation and biodiversity.</p> <p>b. Proposals for new buildings, extensions to existing buildings and means of enclosure should achieve a high standard of design and use sensitive materials that reflect local character, particularly in the Green Belt and other open areas, and be of a scale that is proportionate to the activity proposed. Appropriate provision should be made for access, storage and waste associated with the activity, especially in residential areas.</p> <p>c. Proposals will be expected to incorporate a high quality landscape scheme into the design, especially within the Green Belt and other open areas, in order to integrate the development into the natural landscape.</p> <p>d. New development should be designed to offer a high level of equine welfare in accordance with current legislation.</p> <p><u>de. Proposals to extend and/or enhance the recreational</u></p>

			value of the bridleway network will be supported, provided that there is no conflict with agriculture, nature conservation or with facilities for walkers on existing public footpaths or other paths currently only used by walkers.
MM15	Para 2.86	59	<p>2.86 As an appropriate use of the Green Belt, equestrian uses will be supported. In certain circumstances, <u>equestrian uses may be acceptable within the Green Belt.</u> It is important that the design of new buildings and associated facilities respond positively to their context, which is usually rural in character and landscape. Therefore proposals will be expected to demonstrate that the scale of development, quality of design, use of materials and the landscape scheme will enhance the visual amenity of the area. There are also factors that will influence the location of buildings within the site, such as the need for natural surveillance, site security and welfare considerations. These matters are for the applicant to consider in the context of the specifics of the site when designing the scheme.</p>
MM16	Para 2.88	60	<p>2.88 The policy also includes reference to welfare standards for horses. Environmental Health & Licensing is the body responsible for issuing licences to riding centres and can offer advice to applicants on requirements that may have an impact on the size and design of stables and loose boxes. The Council can therefore offer a collaborative approach to ensuring the aims of the policy are achieved <u>whilst also ensuring equine welfare.</u> This will prevent the need to reapply for a revised scheme if the approved design does not meet the standards required to acquire the <u>necessary licences.</u></p>
MM17	Para 2.90	61	<p>2.90 The open space within Elmbridge is essential to its character and contributes to the quality of the landscape and the network of green infrastructure. It is very important to local people, who enjoy the visual benefits, wildlife habitats and the recreation function it provides. <u>In addition, open spaces are also beneficial in helping to minimise flood risk.</u></p> <p><u>2.91</u> Whilst enjoying similar benefits, Green Belt serves five distinct purposes³⁶ that are not shared by land in more urban and residential parts of the Borough. Therefore this policy does not cover all Green Infrastructure Assets, as defined in the Core Strategy (CS14 – Green Infrastructure), by excluding areas in the Green Belt that are covered by separate Development Management policies. CS14 also covers other Green Infrastructure Assets that this policy does not, such as Suitable Accessible Natural Greenspace, so they should be assessed together. For the avoidance of doubt, part</p>

			<u>(c) of the policy applies across the relevant parts of the whole Borough, including the Green Belt.</u>
MM18	DM7, Para 2.25	25	<p>2.25 The high trip rate of the Borough's residents to work, train stations and local services result in congestion on the roads and emissions that adversely affect air quality. The Core Strategy aims to minimise the effect of trips by encouraging new development in accessible locations, encouraging use of sustainable transport modes and applying maximum parking standards, including consideration of zero parking for certain town centre developments. However, in many instances zero parking will not be acceptable and this is often the case in areas where on-street parking stress is a particular problem and there is no suitable alternative provision. In such cases, the Council will require one parking space per residential unit for new developments in order to ensure that the existing pressure to park on nearby roads is not exacerbated. <u>Factors to take into account when considering whether an area experiences on-street parking stress will be the levels of parking on nearby roads, the availability of spaces in public car parks and whether there are any particular pressures caused by existing uses or developments in the area.</u> The level of parking that should be provided on non-residential developments in areas of parking stress will be individually assessed, taking into account the availability of other parking and travel options for shoppers, workers and visitors in that location. The onus will be on the applicant to demonstrate why zero parking is appropriate in a given location. This Development Management policy supports the aims of the Core Strategy by providing detailed parking standards that are also based on maximums and ensuring that proposals affecting public car parks are carefully considered in terms of the wider impact on the Borough.</p>
MM19	Appendix 1, Parking Standards for Residential Parking	74	<u>e. As set out in policy DM7-Access and Parking, in areas of parking stress the Council would expect a minimum of 1 space per residential unit.</u>

(NB Appendix 6, including the whole of the table below, is entirely new but for ease of reading the text has not been underlined here)

Appendix 6: Additional Indicators

1 Monitoring is an essential part of the Local Plan process. It allows us to analyse housing, economic, environmental and social performance which, in turn, helps us to measure the effectiveness of our policies and strategies. The following series of additional indicators have been created to help in assessing the effectiveness of the Development Management Plan in meeting the overarching objectives of the Local Plan.

2 Performance of the Local Plan will be assessed on an annual basis through the Authority's Monitoring Report (AMR).

Policy	DM Policy	CS Objective	Indicator/s	Source	Target
DM1	Presumption in favour of sustainable development	1	- Total number of planning appeals p.a. and proportion dismissed	Annual review of planning appeals	Assessment of all targets within the monitoring framework
DM2	Design and amenity	2/3/5/7/16	- Proportion of appeals dismissed for development that fails to achieve a high standard of design and layout and or privacy and amenity -	Annual review of planning appeals	100% dismissed at appeal
DM3	Mixed Uses	4/5/9/10/11/12/15 /17	- Appeals dismissed for proposals detrimental to town centre vitality and viability - Number of planning permissions granted for major development in town centres with only one use	Annual review of planning appeals Review Annual review of planning permissions	100% dismissed at appeal No wholly residential town centre permissions

Policy	DM Policy	CS Objective	Indicator/s	Source	Target
DM4	Comprehensive development	4/5/9/10/11/15	Measured through existing indicators		
DM5	Pollution	7	<ul style="list-style-type: none"> - Per capita reduction in CO₂ emissions in the Borough. - Appeals dismissed which are considered to contravene/ fail to achieve pollution related standards within DM5 	Environmental Services monitoring of emissions Annual review of planning appeals	<ul style="list-style-type: none"> - Continued reduction - 100% dismissed
DM6	Landscape and trees	8	<ul style="list-style-type: none"> - Appeals dismissed for applications considered to have a negative impact on the Boroughs landscape and trees 	Annual review of planning appeals	100% dismissed
DM7	Access and parking	3/4/5	<ul style="list-style-type: none"> - Number of planning permission granted which accord with Elmbridge Parking Standards 	Annual review of planning permissions	All permitted applications accord with parking standards
DM8	Refuse, recycling and external plant	18	Measured through existing indicators		

Policy	DM Policy	CS Objective	Indicator/s	Source	Target
DM9	Social and community facilities	10/13/17/ 18	- Planning permissions granted for the provision or improvement of social and community facilities	Annual review of planning permissions	Net increase in number of community uses within Elmbridge
DM10	Housing	9/10/11/12/13	- Proportion of residential units permitted below minimum space standards - Number of units permitted on garden land	Annual review of planning permissions.	All new residential units delivered to minimum space standards
DM11	Employment	4/5/15/17	Measured through existing indicators		
DM12	Heritage	2	- Number of planning permissions granted involving the significant harm to, or loss of a designated heritage asset.	Annual review of planning permissions	None, except where justified in accordance with the policy
DM13	Riverside development and uses	7/16	- Number of planning permissions granted which secure river restoration or enhancement or impact on the Boroughs riverside areas	Annual review of planning permissions	100% of permissions granted having a positive impact on the Boroughs riverside areas as set out in DM13.

Policy	DM Policy	CS Objective	Indicator/s	Source	Target
DM14	Evening Economy	3/15/16/17	- Proportion of planning applications considered detrimental to town centre vitality and viability dismissed at appeal	Annual review of planning appeals	100% dismissed
DM15	Adverts, shop fronts and signage	17	- Proportion of planning applications for inappropriate advertisements dismissed at appeal	Annual review of planning appeals	100% dismissed
DM16	Telecommunications	15/18	- Proportion of planning applications for inappropriate telecommunications development dismissed at appeal	Annual review of planning appeals	100% dismissed
DM17	Green Belt (development of new buildings)	8/18	- Planning permissions granted for new buildings in the Green Belt	Annual review of planning appeals	100% of permissions accord with policy for the Green Belt, including demonstrating very special circumstances where necessary
DM18	Green Belt (development of existing buildings)	2/8	- Planning permissions granted for replacement dwellings in the Green Belt - Planning permissions granted for	Annual review of planning permissions and planning appeals	100% of permissions accord with policy for the Green Belt, including demonstrating very special circumstances

Policy	DM Policy	CS Objective	Indicator/s	Source	Target
			<p>extensions in the Green Belt.</p> <ul style="list-style-type: none"> - Proportion of planning permissions allowed above permitted volume and footprint limits. 		ces where necessary
DM19	Horse-related uses and development	3	<ul style="list-style-type: none"> - Total number of permissions granted for horse related activity - Proportion granted at appeal 	Annual review of planning permissions and planning appeals	No horse related development granted at appeal
DM20	Open Space and views	2/8	Measured through existing indicators		
DM21	Nature conservation and biodiversity	7/8	Measured through existing indicators		
DM22	Recreational uses of waterways	7/16	<ul style="list-style-type: none"> - Planning permissions granted which support the recreational use of the Borough's waterways. 	Annual review of planning applications	100% of permissions maintain and enhance recreational activity on the Borough's waterways in accordance with DM22