

Ipswich Borough Council Local Plan

Topic Paper: Development Management Policies

Revisions to the adopted Core Strategy and Policies development plan document

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**Development and Public Protection
Ipswich Borough Council
Grafton House, Russell Road
Ipswich IP1 2DE
(01473) 432019**

email:
planningandregeneration@ipswich.gov.uk
website:
www.ipswich.gov.uk

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Introduction

What the Council is doing

1. The Council is currently preparing a review of its adopted Core Strategy and Policies development plan document (December 2011) and a Site Allocations and Policies (incorporating IP-One Area Action Plan) development plan document. These documents form the Council's Local Plan, which guides future development in the Borough.
2. Proposed submission versions of the two plans were published for public consultation on 12th December 2014, under regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012. This followed informal consultation (under regulation 18) between January and March 2014.
3. The Core Strategy and Policies development plan document review (hereinafter referred to as the Core Strategy review) will replace the adopted Core Strategy and Policies development plan document when adopted (anticipated in late 2015).
4. The Site Allocations and Policies (incorporating IP-One Area Action Plan) development plan document (DPD) (hereinafter referred to as the Site Allocations Plan) is a new plan. It will replace the remaining saved policies of the adopted Ipswich Local Plan (November 1997) when adopted (anticipated in late 2015).
5. The Council is undertaking a public consultation on the Core Strategy review, the Site Allocations Plan and their supporting sustainability appraisal and appropriate assessment reports. The consultation period will run from Friday 12th December 2014 to Thursday 5th March 2015 and further details can be found on the Council's website, www.ipswich.gov.uk/consultations, at the Council's offices at Grafton House and the Customer Services Centre at the Town Hall, or in Ipswich libraries.

National Planning Policy Framework – Plan Making

6. The National Planning Policy Framework (NPPF) was introduced in March 2012 following the introduction of the Localism Act in November 2011. The NPPF is national planning guidance and Local Plan documents such as the Core Strategy must refer to the principles established in the document.
7. The NPPF notes in paragraph 182 that the Local Plan will be assessed at the Examination in Public whether it has been prepared in accordance with the Duty to Co-operate, legal and procedural requirements, and whether it is sound.
8. The Duty to Co-operate was introduced through Section 110 of the Localism Act 2011 in November 2011. It is a legal duty on local planning authorities to co-operate constructively, actively and on an ongoing basis with neighbouring authorities, county councils and other prescribed bodies in planning for strategic, cross boundary matters. The duty to co-operate came into force on 15th November 2011 and any plan submitted for examination on or after this date will be examined for compliance. Local planning authorities are expected to provide evidence of how they have complied with any requirements arising from the duty. Non-compliance with the duty to co-operate cannot be rectified after the submission of a plan.

9. The Inspector will first check that the plans meet the legal requirements under s20(5)(a) of the Act before moving on to test for soundness. Legal requirements include e.g. whether it is included in the Council's Local Development Scheme; whether the Council's Statement of Community Involvement has been followed; and whether documents have been published and made available for public inspection.
10. To be sound the plan must be:
 - **'Positively prepared** – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
 - **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
 - **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
 - **Consistent with national policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.' (Para 182, p. 43)
11. Paragraph 15 of the NPPF notes 'a presumption in favour of sustainable development so that it is clear that development which is sustainable can be approved without delay' and plans include 'clear policies that will guide how the presumption should be applied locally' (p.4).

National Policy Context

12. Paragraph 17 of the NPPF identifies within its core planning principles that Local Plans 'should provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency'. In paragraph 154, the NPPF further states that Local Plans should be aspirational but realistic and that policies should only be included in a plan that 'provide a clear indication of how a decision maker should react to a development proposal'. Therefore the Core Strategy review contains a number of development management specific policies to guide the determination of planning applications.

Core Strategy Review – Development Management Policy Changes

13. Chapter 9 of the Core Strategy sets out the borough wide development management policies. Further site allocations and area specific policies will be set out in the Site Allocations Plan once it has been adopted.
14. The purpose of the Core Strategy review has been to align the policies of the Core Strategy and Policies DPD with changes in the legislation that have been seen since its adoption in December 2011, and to take into account changes in the supporting evidence base. With regards to the development management policies, in most cases this has been only a matter of changing the wording of the policy or supporting text rather than a wholesale change of policy direction, however some consolidation of the policies has been undertaken. In addition some policies that were introduced through

the draft Site Allocations Plan in October 2013 have been incorporated into the Core Strategy review.

15. This section details the proposed changes to the development management policies.

Sustainable Development Policies

Policy DM1 – Sustainable Design and Construction

16. This policy was previously referred to as ‘Sustainable Development’ and is now referred to as ‘Sustainable Design and Construction’.
17. The policy requires a minimum of Code for Sustainable Homes (CfSH) level 4 or equivalent in new-build residential development and BREEAM (Building Research Establishment Environmental Assessment Method) Domestic Refurbishment Very Good standard or equivalent for conversions and changes of use of existing buildings to residential use. New build non-residential development of 500 square metres and above for the whole development should achieve a minimum of BREEAM Very Good or equivalent. Conversions and changes of use to non-residential uses with an internal floor area of 500 square metres and above should also achieve a minimum of BREEAM Very Good standard of equivalent.
18. Previously the policy set progressive standards to eventually achieve CfSH level 6 for residential development from 2016 and BREEAM ‘Excellent’ for non-residential development over 500 square metres or more from 2013. However, the change to CfSH level 4 is a result of: 1) the viability of achieving CfSH level 5 and 6 as the cost of going from level 4 to 5 is significant; and 2) the Government’s housing standards review¹ to be implemented in 2015 requiring no conditions to exceed energy efficient requirements above CfSH level 4, and the move to zero carbon homes in 2016. The change to BREEAM ‘Very Good’ reflects what is considered viable at present. The Government is intending to implement a zero carbon buildings programme in 2019 for non-residential development.
19. In order to achieve zero carbon homes the Government is considering the introduction of ‘Allowable Solutions’². The introduction of allowable solutions would see all new homes meet sustainability levels by a combination of three on, and off-site methods. These would be through Fabric Energy Efficiency measures built into the design of new homes, Carbon Compliance through on-site renewables, and the remainder comprising of payments towards off-site allowable solutions. Should allowable solutions payments be introduced these payments could be administered either locally through a Community Energy Fund, or regionally / nationally.

Policy DM2 – Decentralised Renewable or Low Carbon Energy

20. The policy seeks on-site micro-generation of 15% of all energy requirements on all sites over 10 dwellings or 1000 sq. m, known as a ‘Merton Rule’ policy. Where 15% energy production is not possible, energy efficiency in the building fabric as an alternative is acceptable.

¹ Housing Standards Review – Technical Consultation (Department for Communities and Local Government, 2014)

² Next steps to zero carbon homes – Allowable Solutions (Department for Communities and Local Government, 2014)

21. The Core Strategy review removes references to PPS1 / PPS22, East of England Plan policies ENG1, ENG2 and regional targets, and replaces these with reference to low carbon commitments made within the NPPF.
22. The policy now includes greater detail as to what might be acceptable if in viability terms the provision of 15% of its energy cannot be from decentralised renewable or low-carbon sources. The introduction of passive house design or other inbuilt energy efficiency measures are proposed.

Policy DM3 – Provision of Private Outdoor Amenity Space in New and Existing Developments

23. The policy sets the requirements for minimum private garden areas in new developments and private outdoor amenity space for all apartments or upper floor maisonettes to ensure new residential developments deliver a suitably high quality and environmentally sustainable living environment.
24. The review change sees the introduction of the Space and Design Guidelines supplementary planning document (SPD) into the policy text. This SPD will be prepared in 2014 and will replace the Council's Development Control Policies and Design Guidelines (1992) and the Good Practice Guide to Developing your Home (1999). The SPD is expected to be adopted in late 2015.

Flooding and Sustainable Drainage Policy

Policy DM4 – Development and Flood Risk

25. The policy identifies that development will only be approved if it satisfies criteria to ensure it does not increase the risk of flooding through the use of sustainable drainage systems (SuDS), it will be protected from flooding in accordance with adopted standards, will remain safe for people through the lifetime of the development, and includes water efficiency measures such as rainwater harvesting.
26. The review looks to alter references from PPS25 to the NPPF and the supporting technical guidance note. Flood Risk Assessments (FRAs) will now be required to demonstrate that more vulnerable and less vulnerable developments sited in Flood Zones 2 and 3a will be 'safe' in accordance with the Development and Flood Risk supplementary planning document, that was adopted on 18th September 2013.

Urban Design Policies

Policy DM5 – Design and Character

27. This policy was previously referred to as 'Urban Design Quality' and is now referred to as 'Design and Character'.
28. The emphasis of the policy remains to secure the highest quality urban design principles in proposed development. The Core Strategy review shows changes that have been made to the Building for Life set of criteria which is used in assessing design quality in major applications for residential development. This criteria has been reduced from 20 categories to 12, and to achieve the 'Building for Life Diamond' status as an exemplar scheme, a 'green' score must be achieved in each of the 12 categories.

29. The amended policy includes an enhanced focus on biodiversity and greening of streets as a way of contributing to health, welfare and quality of life for everyone who lives and works in the urban environment along with being an additional habitat for wildlife.

Policy DM6 – Tall Buildings

30. This policy establishes that planning permission for tall buildings will be granted within the arc of land to the south-west of the town centre in the vicinity of Civic Drive and the Northern Quays of the Waterfront provided that any proposed building satisfies a number of criteria. In other locations within the Borough proposals for tall buildings may exceptionally be considered to be appropriate if it can be demonstrated they satisfy the criteria in the policy.
31. No significant change to this policy is proposed.

Policy DM7 – Public Art

32. The policy required the inclusion of public art equivalent to 1% of construction contract values unless this has an impact on viability.
33. The policy has been deleted in the Core Strategy review and public art has been combined with policy DM5 ‘Design and Character’.

Protecting Our Assets Policies

Policy DM8 – Heritage Assets and Conservation

34. The policy was previously referred to as ‘Conservation Areas’ and is now referred to as ‘Heritage Assets and Conservation’.
35. The policy has been expanded to greater encompass the historic environment of the town rather than simply focusing on conservation areas. This also addresses the gaps in national policy created relating to the historic environment following the replacement of Planning Policy Statement 5 with the NPPF. The policy is now comprised of three sections covering: Listed buildings, conservation areas and archaeology.

Policy DM9 – Buildings of Townscape Interest

36. The Local List (Buildings of Townscape Interest) supplementary planning document was adopted by the Council on 18th September 2013. The Core Strategy review inserts this information into the explanatory policy text. Reference to PPS5 has been replaced with reference to NPPF policies on the protection of historic assets.

Policy DM10 – Protection of Trees and Hedgerows

37. The Core Strategy review strengthens the Council’s policy on tree protection, with particular reference being made to care of trees and the need to increase canopy cover where possible. The adherence to BS3998 ‘Tree work – Recommendations’ 2010 for tree management options (including soil care and tree felling) is now expected.
38. Development that results in the loss or deterioration of aged or veteran trees found outside ancient woodland should be refused, and tree planting to help achieve 22% canopy cover by 2050 is to be encouraged.

39. The reference to the 'Guide for Trees in Relation to Construction' has been updated to the most recent 2012 version.
40. Explanatory text is added to with the need to recognise the setting of protected trees in new development and that tree planting on development sites should not be an afterthought. Reference to BS5837: 2012 is made in this respect. The benefits arising from trees and tree planting in terms of their positive impact on urban cooling, the increase in climate change resilience, and improvements to landscape, recreation and wildlife are also included.

Policy DM11 – Ipswich Skyline

41. Central Ipswich is circled by a wooded skyline, which is particularly important to the setting of the central area including Ipswich Village and the Waterfront. The policy had set out that developments would only be permitted where they did not seriously disrupt this setting, especially when viewed from key viewpoints.
42. This policy has been deleted in the Core Strategy review and the protection of important views has been incorporated into policy DM5 'Design and Character' and policy DM6 'Tall Buildings'.

Small Scale Residential Development – Extensions and Ancillary Buildings

Policy DM12 – Extensions to Dwellinghouses and the Provision of Ancillary Buildings

43. A new Space and Design Guidelines supplementary planning document (SPD) will supersede existing Development Management guidance documents. The introduction of recent additional 'permitted development' rights will be acknowledged in this SPD, however the need for high standards of development are still required to protect the amenity of neighbours and the area as a whole.
44. Additional criteria have been put in the policy to assist in the determination of applications for residential annexes.

Small Scale Residential Development – Small Scale Infill and Backland Residential Development

Policy DM13: Small Scale Infill and Backland Residential Development

45. The Core Strategy review includes the clarification (as seen in policy DM12) that existing design guidelines will be superseded by a future Space and Design Guidelines SPD. This policy sets out criteria for assessing small scale infill and backland residential developments.

The Subdivision of Family Dwellings

Policy DM14: The Subdivision of Family Dwellings

46. The policy sets out the criteria for assessing the subdivision of family dwellings. The Core Strategy review amends the policy text by separating the impact on amenity of neighbouring residents (from conversions), into its own criteria (e).

Travel Demand Management

Policy DM15: Travel Demand Management

47. This policy had set out the criteria for considering proposals for the development of 10 or more dwellings or 1,000 square metres or more of non-residential floorspace, or where more than 50 people would be employed in respect of travel demand management.
48. The policy has been deleted in the Core Strategy review to streamline the plan and its content has been incorporated into policy DM17 'Transport and Access in New Developments.'

Policy DM16: Sustainable Transport Modes

49. This policy had set out the criteria for considering proposals for all other new developments not referred to in policy DM15.
50. The policy has been deleted in the Core Strategy review to streamline the plan and its content has been incorporated into policy DM17 'Transport and Access in New Developments.'

Transport and Access

Policy DM17: Transport and Access in New Developments

51. The policy sets out criteria for new developments in promoting sustainable growth and reducing the impact of the new development on traffic congestion. These include promoting pedestrian and cycle accessibility and permeability within the sites, providing high quality, secure cycle parking/storage, and additionally in non-residential developments of more than 1,000 square metres or where more than 50 people are employed to provide high quality shower facilities and lockers. In addition, electric charging points and a car club scheme are supported to reduce car usage and improve air quality. The Rights of Way Improvement Plan now forms part of the published Suffolk County Council Local Transport Plan 2011 – 2031.

Parking

Policy DM18: Car Parking

52. Policies DM18 'Car Parking' and DM19 'Cycle Parking' have been amalgamated and policy DM18 is now referred to as 'Car and Cycle Parking.'
53. The policy requires minimum (this should read 'adopted') standards of car and cycle parking to be complied with in all new development (except in the central IP-One area of the Borough). The change from 'minimum' to 'adopted' is to reflect maximum parking standards for vehicles in non-residential development. Residential vehicle parking standards are minimum standards outside of the central IP-One area, with reduced maximum standards within the IP-One area which is within and close to the town centre, and where there are more frequent opportunities for alternative modes of travel.

54. Cycle parking standards are minimum standards across the Borough. The Council will also require the provision of secure cycle parking in any new car parks in the town. Cycle parking is required to be secure, sheltered, conveniently located, adequately lit, step-free and accessible.
55. A central car parking core will be defined in the town centre through the Site Allocations Plan and will only permit operational car parking in connection with non-residential development so the stock of long-stay car parking is not increased. New, non-residential long-stay car parks will not be permitted. Suffolk County Council adopted Suffolk Guidance for Parking in November 2014.

Policy DM19: Cycle Parking

56. The policy has been deleted in the Core Strategy review and amalgamated with policy DM18 as mentioned previously.

Proposals in Retail Areas

Policy DM20: The Central Shopping Area

57. Policy DM20 sets the Council's policy on the make-up of the Primary, Secondary and Specialist Shopping Areas, and where particular uses will be acceptable and to what level. The main focus remains for A1 Retail uses to be predominant, however the policy now acknowledges that other 'main town centre uses', such as leisure, recreation, culture, and tourism uses will now be acceptable in both Secondary and Specialist Shopping Areas provided that they do not exceed the maximum percentages specified.
58. The Core Strategy review seeks to set a limit of A2-A4 uses at a maximum of 15% in the Primary Shopping Area. This has been increased from 10% previously. A5 (hot food take-away) uses are removed from this criteria as part of the review. In Secondary Shopping Areas there is no change to the expected make up of uses. In the Specialist Shopping Areas A2 uses (Financial and Professional Services) are now included to be limited, along with A4 or A5 uses to be a maximum of 35% in any identified ground floor frontage.
59. The policy now includes the former draft Site Allocations policy DM47 'Central Shopping Area' to bring all the development management policy together.

Policy DM21: District and Local Centres

60. Having particular regard to development proposals for the change of use of ground floor units to community facilities, the Core Strategy review seeks for Council agreement on marketing strategies, which must be implemented for a period of 12 months prior to the submission of a planning application for change of use or redevelopment. Any such change of use application will now need to be submitted with an independent appraisal of the economic viability of the facility in its current use.
61. Where proposals would see the use change to residential, at least a 12 month vacancy will need to be demonstrated, and other uses identified in the policy (paragraphs a, b, or c) will be expected to be considered first.
62. The reviewed policy acknowledges the development of the Duke Street District Centre and therefore seeks the addition of one (rather than two) further District Centre at Sproughton Road.

63. The policy now includes former draft Site Allocations policies DM37 'District and Local Centres' and DM50 'District and Local Centres within IP-One', to bring all the development management policy together.

Policy DM22: Town Centre Uses outside the Central Shopping Area

64. The emphasis of the policy remains to control town centre non-retail uses, however the Core Strategy review sees only industrial uses B2 and B8 as being uses that would not be permitted in the Town Centre.
65. The Town Centre boundary has been expanded to the south-west to include much of the Ipswich Village, and to the south to include Ipswich Railway Station. The Town Centre boundary will now be defined through the Site Allocations Plan (IP-One inset map).
66. Reference to PPS4 has been replaced with the NPPF.
67. The policy now includes former draft Site Allocations policy DM51 'Town Centre Boundary' to bring all the development management policy together.

Policy DM23: Retail Proposals outside Defined Centres

68. As part of the Core Strategy review policy DM23 text requires retail proposals of more than 200 sq. m net to demonstrate their acceptability in terms of the NPPF. Previously the figure was gross, and reference was made to PPS4. The four criteria of appropriate scale; sequential approach; avoiding adverse impact on existing Centres; and being accessible by a choice of means of transport remain.
69. The supporting text details that out of town retail parks, sole retail warehouses and large foodstores are not considered as defined centres, and therefore policy DM23 does not apply. It goes on to describe what retail items the Council considers to be bulky goods.
70. Examples of planning conditions that manage the impact of bulky goods retail developments are included as part of the review changes. Additionally further explanatory text as to what uses (A1, A2, A5) are considered to be Town Centre uses (as defined by the NPPF) and therefore apply to the policy. Uses A3 and A4 are considered to be Leisure Uses in the NPPF and therefore are not subject to this policy. It is important to distinguish between these use classes as it affects the application of the sequential test as set out in the NPPF.

Affordable Housing

Policy DM24: Affordable Housing

71. The policy seeks affordable housing in accordance with Core Strategy policy CS12 and there is a presumption in favour of on-site provision.

Employment Land

Policy DM25: Protection of Employment Land

72. The policy seeks the protection of land that is used for and/or allocated for employment uses. The Core Strategy review seeks to safeguard defined Employment Areas for employment uses as defined on the policies maps and listed in the policy itself. New text is inserted in the policy to allow for a change of use from employment where the site has been allocated for an alternative use in the Site Allocations Plan. In addition, outside the defined Employment Areas, change of use from B1, B2 or B8 to other uses (except non-ancillary retail) may be considered where there is no reasonable prospect of the site being re-used for employment purposes over the plan period.
73. Reference to the East of England Economic Strategy has been removed from the explanatory text, as has reference to PPS4 which has been replaced by the NPPF.
74. A description of Ancillary Use has been added to the text. This sets out that ancillary uses are defined in terms of size of floorspace and there being a functional relationship with the main B class use. Ancillary retailing should be less than 10% of the floorspace or 200 sq. m net, whichever is the smaller.
75. The policy now includes former draft Site Allocations policy DM36 'Employment Areas' and explanatory text from deleted Site Allocations policy DM46 'Port of Ipswich' to bring all the development management policy together.

Amenity

Policy DM26: Protection of Amenity

76. The Core Strategy review removes out of date reference to PPG24 and does not permit development where it could cause material nuisance to the proposed, existing and / or adjacent users, residents, occupiers or where it is liable to be detrimental to human health. Development which itself could be significantly adversely affected by the conduct of established or potentially noisy or polluting uses nearby will not be permitted. Exceptions will only be made where satisfactory mitigation measures can be secured.

Policy DM27: Non-residential Uses in Residential Areas

77. The policy identifies when non-residential uses will be permitted in residential areas.

Open Spaces, Sport and Recreation

Policy DM28: Protection of Open Space, Sport and Recreation Facilities

78. The Core Strategy review adds to the two existing reasons in policy DM28 where development involving the loss of open space, sports or recreation facilities will be permitted. The additional reason is where the development is for alternative sports and recreation provision where the need clearly outweighs the loss.
79. References to PPG17 have been replaced with those in the NPPF.

Policy DM29: Provision of New Public Open Space, Sport and Recreation Facilities

80. The Core Strategy review emphasises that 10% of the site area (15% in high density developments) of major developments will need to be made available for on-site green space (useable by the public in relation to residential schemes), and that it will now be required to contribute to the overall provision of sports and recreation facilities in the development catchment area, which includes children's play areas and for young people.

The Density of Residential Development

Policy DM30: The Density of Residential Development

81. The policy explains the density of new housing development sought in the Borough with high density of at least 90 dwellings per hectare (dph) expected within the town centre, Ipswich Village and Waterfront. Within the remainder of the IP-One area, District Centres and an 800 metre area around District Centres, development will be expected to achieve a medium density of at least 40 dph. Elsewhere in Ipswich, low-density development will be required (the average will be taken at 35 dph).

Natural Environment

Policy DM31: The Natural Environment

82. The policy was previously referred to as 'Conserving Local Natural and Geological Interest' and is now referred to as 'The Natural Environment'.
83. The policy sets out that all development is expected to incorporate measures to enhance conditions for biodiversity within and around the development. The policy has been merged with former draft Site Allocations policy DM34 'The ecological network' and re-written to better reflect national policy and statutory guidance. The Council will seek to conserve and enhance an ecological network across the Borough.

Community Facilities

Policy DM32: Protection and Provision of Community Facilities

84. Having particular regard to Public Houses the Core Strategy review seeks for Council agreement on marketing strategies, which must be implemented for a period of 12 months prior to the submission of a planning application for change of use or redevelopment. Any such application will now need to be submitted with an independent appraisal of the economic viability of the facility in its current use.

Countryside and Access

Policy DM33: Green Corridors

85. This policy sets out the Council's intention to establish and enhance green corridors within the Borough and linking to adjacent open spaces and walking, cycling or riding routes. It establishes 11 green corridors plus the River Orwell corridor along its navigable length within the Borough.

86. Within the defined green corridors, development will only be permitted where it would maintain, and where possible enhance, the corridor's amenity, recreational and green transport functions. Development proposals which relate closely to river banks will be required to provide for the improvement of public pedestrian and cycle paths along the site boundary relating to the river where appropriate and should enhance its appearance.
87. This policy (formerly DM33 in the draft Site Allocations plan) has been moved into the Core Strategy review to ensure that all the generic development management policies can be found in one place.

Policy DM34: Countryside

88. This policy defines that major development in the countryside within the Borough will only be permitted provided it respects the character of the countryside and is necessary to support a sustainable rural business including tourism or is a recreational use of land which retains its open character. Criteria are set for any proposals.
89. This policy (formerly DM35 in the draft Site Allocations plan) has been moved into the Core Strategy review to ensure that all the generic development management policies can be found in one place.

Conclusion

90. The Council in its Proposed Submission Core Strategy review has updated references to the development management policies as a result of the introduction of the National Planning Policy Framework in March 2012 and the abolition of the East of England Plan in January 2013. Further changes have been made to improve the clarity of some policies and improve their effectiveness. Some of the policies have been re-written and amalgamated to provide more detail and reduce the number of policies to be considered when determining planning applications. Comments have also been taken into account from the draft (Regulation 18) round of public consultation in re-writing some of the policies. Previously some new development management policies were included in the draft Site Allocations plan, however following the decision to move from a Core Strategy focused review to a full review it enabled the Council to incorporate all of the development management policies into one chapter by moving some policies from the Site Allocations Plan to the Core Strategy review.