

**Rotherham Local Plan:  
Core Strategy 2013 – 2028**

**Five Year Review**

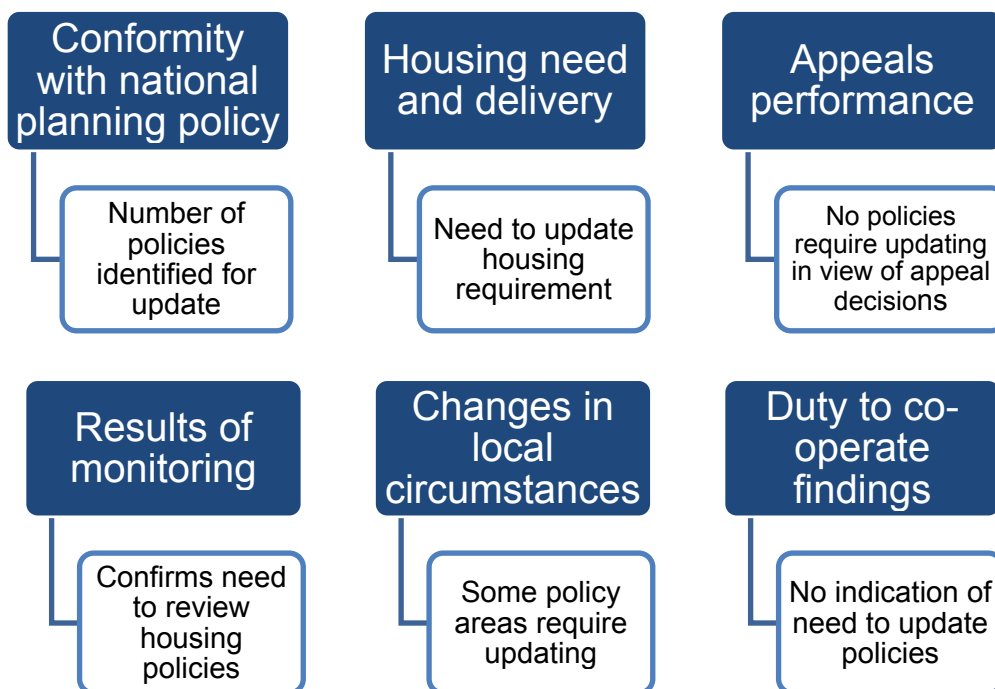
**July 2019**

## Contents

Background.....	3
Conformity with national planning policy .....	3
Housing need and delivery.....	4
Appeals performance .....	5
Results of monitoring .....	5
Changes in local circumstances.....	6
Duty to co-operate findings .....	7
Conclusions.....	8
Appendix: Assessment of Core Strategy conformity with national planning policy .....	9
Table 1: Assessment of requirements of national planning policy .....	9
Table 2: Assessment of Core Strategy against national planning policy .....	12

## Background

1. Rotherham Council adopted its Local Plan Core Strategy 2013 – 2028 on 10 September 2014<sup>1</sup>. Local Planning Authorities (LPAs) are required by Government to review their Local Plans and policies at least every 5 years from the date of adoption, and decide either:
  - that their policies do not need updating and publish their reasons for this decision; and/ or
  - that one or more policies do need updating, and update their Local Development Scheme to set out the timetable for this revision.
2. In line with Government guidance a review has been undertaken which has considered a number of factors. These, along with a high level indication of the outcomes, are set out below:



### Conformity with national planning policy

3. In assessing the Core Strategy against national planning policy a two-fold approach has been taken: a consideration of the Core Strategy against the requirements of each chapter of National Planning Policy Framework (NPPF)<sup>2</sup> and other relevant national policy<sup>3</sup>, and an assessment of each Core Strategy policy against national policy. The review of policies has also taken into account any specific changes in local circumstances identified during assessment and identified where revisions may be helpful but which do not in themselves require an update. The tables in the appendix summarise this assessment.
4. As a result the following areas are identified as requiring updates:

<sup>1</sup> [https://www.rotherham.gov.uk/info/200074/planning\\_and\\_regeneration/617/a\\_guide\\_to\\_the\\_local\\_plan/2](https://www.rotherham.gov.uk/info/200074/planning_and_regeneration/617/a_guide_to_the_local_plan/2)

<sup>2</sup> <https://www.gov.uk/guidance/national-planning-policy-framework>

<sup>3</sup> <https://www.gov.uk/government/collections/planning-practice-guidance>

<b>Housing policies</b>	<ul style="list-style-type: none"> <li>• To reflect the introduction of the housing delivery test and standard method for calculating housing need.</li> <li>• To take account of the conclusions of the revised Strategic Housing Market Assessment.</li> <li>• To update the evidence regarding provision for Gypsy and travellers.</li> <li>• To take account of the latest evidence and ensure a robust affordable housing policy is in place.</li> <li>• To consider opting in to the Government's technical housing standards.</li> <li>• To provide a housing requirement for designated Neighbourhood Plan areas (with consideration also to be given to identifying figures for all parished areas).</li> </ul>
<b>Employment policies</b>	<ul style="list-style-type: none"> <li>• To update economic policies if necessary to ensure alignment of housing and employment land requirements.</li> </ul>
<b>Flood risk and water management</b>	<ul style="list-style-type: none"> <li>• To improve consistency of policies with national planning practice guidance, and reflect up to date evidence regarding climate change and surface water flooding.</li> </ul>
<b>Low Carbon &amp; Renewable Energy Generation, and Minerals</b>	<ul style="list-style-type: none"> <li>• To consider how policies could be updated to move towards a net zero climate change / net zero carbon approach. This recognises the continuing challenges of climate change, the importance of reducing carbon emissions and reducing reliance on fossil fuels.</li> </ul>
<b>Presumption in favour of sustainable development</b>	<ul style="list-style-type: none"> <li>• To reflect revised national planning policy.</li> </ul>
<b>Infrastructure</b>	<ul style="list-style-type: none"> <li>• To update the Infrastructure Delivery Schedule, which supports delivery of growth, set out in the Core Strategy.</li> </ul>

## Housing need and delivery

### Housing need

5. The Core Strategy makes provision to meet an objectively assessed housing requirement of 850 net additional dwellings per annum over the plan period of 2013 to 2028 (totalling 12,750 dwellings), plus backlog against that requirement from April 2008 to March 2013 (1,621 dwellings). This results in an overall total requirement of 14,371 homes (equivalent to 958 dwellings per annum over the plan period). This figure reflected the position at the time and was determined the Government-appointed Inspector who carried out the independent examination of the Core Strategy.
6. Central Government revisions to the NPPF in 2018 have introduced a requirement to determine the minimum number of homes needed for a local authority using a standard method set out in national planning guidance (unless exceptional circumstances justify an alternative approach).

7. In addition to the local housing need figure, national planning policy sets out that any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for, where this has been agreed between the authorities concerned.
8. The Council has been approached by four local authorities to consider whether Rotherham could accommodate some housing growth. However the Council has identified that it is unable to offer any capacity to meet additional housing needs from elsewhere (see Duty to co-operate findings).

### **Housing delivery**

9. The Government has also introduced an annual Housing Delivery Test which measures net additional dwellings against the number of homes required over the previous three years. The first Housing Delivery Test results were published in February 2019<sup>4</sup>. Rotherham's results show that 92% of the target was delivered, requiring the Council to prepare a housing delivery action plan.
10. It is recognised that the Sites and Policies document<sup>5</sup> has only recently been adopted (June 2018) and new housing development sites allocated. Annual net additions of dwellings are expected to improve given the release of new sites, having regard to the time required to bring these forward and the proactive work being undertaken by the Council.
11. The NPPF states that local planning authorities must identify a deliverable five year supply of housing sites. The Inspector examining the Sites and Policies document was satisfied that the Council is committed to ensuring that sufficient housing land is provided at the appropriate time to meet anticipated needs, to help to maintain a rolling five year supply of housing land in the Borough.
12. Given the difference between the new local housing need figure and the existing Core Strategy requirement, consideration should be given to whether an update to the Core Strategy housing requirement is required.

### **Appeals performance**

13. Between adoption of the Core Strategy in 2014 and 1 February 2019 the Council received 163 planning appeal decisions. 69% of these decisions to refuse permission were upheld by Inspectors at appeal, and 31% were allowed (or allowed in part). However many of these cases did not include reasons for refusal based on Core Strategy policies. Detailed analysis of those appeals where specific Core Strategy policies are referred to in the reasons for refusal reveals no major areas of concern or indications that Core Strategy policies require an update. It does identify one area in relation to Policy CS19 where consideration could be given to updating the policy to provide greater clarity regarding the achievement of a 'net gain' in green infrastructure. However it is considered that further clarity could be delivered through other means, such as additional guidance, rather than requiring an update of the policy.

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<sup>4</sup> <https://www.gov.uk/government/publications/housing-delivery-test-2018-measurement>

<sup>5</sup> [https://www.rotherham.gov.uk/info/200074/planning\\_and\\_regeneration/617/a\\_guide\\_to\\_the\\_local\\_plan/3](https://www.rotherham.gov.uk/info/200074/planning_and_regeneration/617/a_guide_to_the_local_plan/3)

## Results of monitoring

14. The Council publishes an Annual Monitoring Report (AMR) which assesses performance of Core Strategy policies using a range of indicators<sup>6</sup>. Considering the monitoring data from 2014 onwards (following adoption of the Core Strategy) shows that:
- Indicators for policies in the **'delivering development in sustainable locations'** and **'movement and accessibility'** chapters are broadly similar, with half of indicators consistently improving or on target.
  - More indicators for policies in the **'supporting a dynamic economy'** chapter have been fairly consistently improving or on target than declining or with no change or update.
  - Indicators for policies in the **'managing the natural and historic environment'** chapter have mainly been improving / on target or with no significant change or update.
  - Since 2014 indicators for policies in the **'creating safe and sustainable communities'** chapter show consistent improvement / on target (63% or above) and low levels of indicators declining or not on target.
  - There has been **consistent improvement or good performance** in relation to development on previously development land, industrial vacancy rates, new business registrations, employment rate and the amount of landfill / recycling rates.
  - There has been **consistent decline or poor performance** in relation to residential development rates being below the housing requirement, including lower delivery in Rotherham Urban Area, vacancies in primary shopping areas, and reductions in public transport useage.
15. The above analysis confirms concerns around meeting the housing requirement, although performance is expected to improve as Local Plan sites come through the planning process. Concerns around retail vacancies and public transport usage are noted; however it is considered that relevant Core Strategy policies remain appropriate, with more detailed policies now implemented following adoption of the Sites and Policies document.

## Changes in local circumstances

16. A review of the Core Strategy issues and objectives show that these remain appropriate and in line with national planning policy, and do not, in themselves, indicate a need to update the Core Strategy.
17. The Core Strategy covers a 15 year period and changes to local strategies and evidence base will inevitably take place during this time. A review of key strategies and evidence base indicates that the majority have not been subject to such significant change as to indicate that the Core Strategy requires updating; however the following is highlighted:
- An updated Strategic Housing Market Assessment has been commissioned jointly with Sheffield City Council.
  - Up to date evidence and data to support affordable housing and viability Supplementary Planning Documents has been commissioned.

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<sup>6</sup> [https://www.rotherham.gov.uk/info/200074/planning\\_and\\_regeneration/729/monitoring](https://www.rotherham.gov.uk/info/200074/planning_and_regeneration/729/monitoring)

- In view of the likely extension of the plan period as part of any Core Strategy update, then up to date evidence regarding Gypsy and traveller housing needs will be required.
- A Sheffield City Region Strategic Employment Land Appraisal has been commissioned. The findings may have implications for Core Strategy policies.
- More up to date evidence is available regarding surface water flood risk within Rotherham.
- Depending upon the scope of any update to flood risk policies then a new Level 1 Strategic Flood Risk Assessment for the borough may be required.
- Climate change continues to be a significant issue requiring action at local, national and international levels. On 2 May 2019, the Committee on Climate Change (CCC) published new advice to the Government on the UK's long-term climate change targets<sup>7</sup>. The CCC have identified that a transition to a near zero carbon economy is now technically achievable and recommends a new emissions target for the UK of net-zero greenhouse gases by 2050. It emphasises that this is only possible if clear, stable and well-designed policies to reduce emissions further are introduced across the economy without delay.
- The infrastructure requirements set out in the 2012 Infrastructure Delivery Study (and summarised at appendix A of the Core Strategy) were partially updated as part of implementing the Community Infrastructure Levy in Rotherham. Further work to update infrastructure requirements will be required to support an update to the Core Strategy.

## Duty to co-operate findings

18. The Inspectors examining both the Core Strategy<sup>8</sup> and the Sites and Policies Document<sup>9</sup> concluded that the Council had complied with its Duty to Co-operate requirements. This duty does not cease upon adoption of a Local Plan document, it is an ongoing process. As such the Council has continued to engage with relevant bodies as appropriate since adoption of the Core Strategy.
19. Four local authorities<sup>10</sup> have previously approached the Council requesting whether it is able to accommodate any of their housing growth. In considering these requests the Council concluded that the land allocated in the Sites and Policies document is sufficient for Rotherham Borough's housing need for the plan period, with a limited buffer of supply to provide flexibility. There is, however, no reserve of land outside of the Rotherham Green Belt that would be suitable to meet housing need in other areas. As such Rotherham Borough Council has been unable to offer any capacity to meet housing need in other areas.
20. A review of recent activity and engagement indicate that there are no Duty to Co-operate issues which highlight a need to update the Core Strategy. There are however ongoing discussions with other authorities in working towards Statements of Common Ground on various matters, including:
  - Doncaster Metropolitan Borough Council (covering a range of issues).
  - Nottinghamshire County Council (focused on minerals matters).

<sup>7</sup> <https://www.theccc.org.uk/publication/net-zero-the-uks-contribution-to-stopping-global-warming/>

<sup>8</sup> [https://www.rotherham.gov.uk/downloads/file/1441/rotherham\\_core\\_strategy\\_inspectors\\_report\\_and\\_appendix](https://www.rotherham.gov.uk/downloads/file/1441/rotherham_core_strategy_inspectors_report_and_appendix)

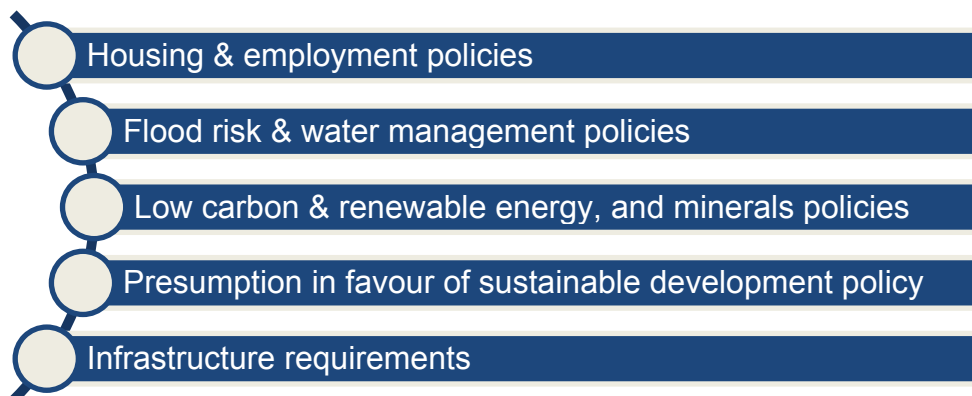
<sup>9</sup> [https://www.rotherham.gov.uk/downloads/file/3843/sites\\_and\\_policies\\_document\\_inspectors\\_report](https://www.rotherham.gov.uk/downloads/file/3843/sites_and_policies_document_inspectors_report)

<sup>10</sup> Barnsley Metropolitan Borough Council (2017), Bolsover District Council (2017), Sheffield City Council (2018), and North East Derbyshire District Council (2018)

- Authorities within the Sheffield City Region (working towards production of a regional Statement of Common Ground, expected to focus on housing, employment and transport matters).
- Cambridgeshire County Council and Peterborough City Council (focused on mineral and waste matters).

## Conclusions

21. In light of this review the following areas of the Core Strategy are identified as requiring an update:



22. The table below sets out a schedule of the Core Strategy policies recommended to be updated.

Policy	Does the Policy require updating?
Policy CS 1 Delivering Rotherham's Spatial Strategy	Yes
Policy CS 2 Delivering Development on Major Sites	no
Policy CS 3 Location of New Development	no
Policy CS 4 Green Belt	no
Policy CS 5 Safeguarded Land	no
Policy CS 6 Meeting the Housing Requirement	Yes
Policy CS 7 Housing Mix and Affordability	Yes
Policy CS 8 Gypsy and Traveller Accommodation	Yes
Policy CS 9 Transforming Rotherham's Economy	Yes
Policy CS 10 Improving Skills and Employment Opportunities	no
Policy CS 11 Tourism and the Visitor Economy	no
Policy CS 12 Managing Change in Rotherham's Retail and Service Centres	no
Policy CS 13 Transforming Rotherham Town Centre	no
Policy CS 14 Accessible Places and Managing Demand for Travel	no
Policy CS 15 Key Routes and the Strategic Road Network	no
Policy CS 16 New Roads	no
Policy CS 17 Passenger Rail Connections	no
Policy CS 18 Freight	no
Policy CS 19 Green Infrastructure	no



Policy	Does the Policy require updating?
Policy CS 20 Biodiversity and Geodiversity	no
Policy CS 21 Landscape	no
Policy CS 22 Green Space	no
Policy CS 23 Valuing the Historic Environment	no
Policy CS 24 Conserving and Enhancing the Water Environment	Yes
Policy CS 25 Dealing with Flood Risk	Yes
Policy CS 26 Minerals	Yes
Policy CS 27 Community Health and Safety	no
Policy CS 28 Sustainable Design	no
Policy CS 29 Community and Social Facilities	no
Policy CS 30 Low Carbon & Renewable Energy Generation	Yes
Policy CS 31 Mixed Use Areas	no
Policy CS 32 Infrastructure Delivery and Developer Contributions	no
Policy CS 33 Presumption in Favour of Sustainable Development	Yes
Policy CS 34 Housing delivery and ongoing co-operation	Yes

23. The assessment below also identifies where some policies may benefit from revision. However it is not considered that circumstances indicate that these require updating at present.

## Assessment of Core Strategy conformity with national planning policy

**Table 1: Assessment of requirements of national planning policy**

NPPF chapter	Summary of assessment
2. Achieving sustainable development	<p>The Core Strategy remains broadly in line with the requirements of this chapter; however with regard to meeting objectively assessed need, consideration will need to be given to the new housing need methodology and any implications for the borough's housing requirement.</p> <p>Housing need from neighbouring authorities will be a consideration for ongoing Duty to Co-operate / Statement of Common Ground discussions and agreements.</p>
3. Plan making	<p>The Core Strategy remains broadly in line with the requirements of this chapter. An assessment indicates that the priorities and objectives of the Core Strategy remain appropriate.</p> <p>An update to the Core Strategy may be required if changes to the evidence base indicate this. In this respect it is noted that:</p> <ul style="list-style-type: none"> <li>• An updated Strategic Housing Market Assessment is being produced.</li> <li>• Up to date evidence and data to support an affordable housing Supplementary Planning Document has been commissioned.</li> <li>• In view of the likely extension of the plan period as part of any Core Strategy update, then up to date evidence regarding Gypsy and traveller housing needs will be required.</li> <li>• More up to date evidence is available regarding surface water flood risk within Rotherham.</li> <li>• Depending upon the scope of any update to flood risk policies then a new Level 1 Strategic Flood Risk Assessment for the borough may be required.</li> </ul>

NPPF chapter	Summary of assessment
	<ul style="list-style-type: none"> <li>• A Sheffield City Region Strategic Employment Land Appraisal has been commissioned. The findings may have implications for Core Strategy policies.</li> <li>• Climate change continues to be a significant issue requiring action at local, national and international levels. On 2 May 2019, the Committee on Climate Change (CCC) published new advice to the UK Government and the Devolved Administrations on the UK's long-term climate change targets. The CCC have identified that a transition to a near zero carbon economy is now technically achievable and recommends a new emissions target for the UK of net-zero greenhouse gases by 2050. It emphasises that this is only possible if clear, stable and well-designed policies to reduce emissions further are introduced across the economy without delay.</li> <li>• The infrastructure requirements set out in the 2012 Infrastructure Delivery Study (and summarised at appendix A of the Core Strategy) were partially updated as part of implementing the Community Infrastructure Levy in Rotherham. Further work to update infrastructure requirements will be required to support an update to the Core Strategy.</li> </ul> <p>An update to policies may also require an extension of the plan period to meet requirements of NPPF. In undertaking any update of the Core Strategy the Council will continue to comply with the duty to co-operate requirements, including the production of statements of common ground as appropriate.</p>
4. Decision-making	Not directly relevant to Core Strategy.
5. Delivering a sufficient supply of homes	<p>Whilst the Core Strategy broadly meets the majority of requirements set out in this chapter the introduction of the standard method for calculating housing need results in an annual housing requirement lower than the Core Strategy requirement. It is considered that an update to the Core Strategy is therefore required.</p> <p>The Council is preparing an updated SHMA. Further consideration will be given to the findings of this update and any implications for Core Strategy policies.</p> <p>An update to Core Strategy policies may be required to ensure the Local Plan complies with national affordable housing policy. Data to support an affordable housing Supplementary Planning Document has been commissioned.</p> <p>In view of the likely extension of the plan period as part of any Core Strategy update, then up to date evidence regarding Gypsy and traveller housing needs will be required.</p> <p>The Core Strategy should be updated to provide a housing requirement for designated Neighbourhood Plan areas, and consideration given to identifying figures for all parished areas to provide long term clarity for parishes which may consider preparing Neighbourhood Plans in the future.</p>
6. Building a strong, competitive economy	Existing policies meet the requirements set out in this chapter. A Sheffield City Region Strategic Employment Land Appraisal has been commissioned. The findings may have implications for Core Strategy policies. A review of economic policies is likely to be required in tandem with any update of housing requirement, to ensure that housing and economic growth remains aligned.

NPPF chapter	Summary of assessment
7. Ensuring the vitality of town centres	<p>The Core Strategy meets the requirements of NPPF, including establishing a local threshold for impact assessments. There is no evidence that the hierarchy of centres or strategic policy in the Core Strategy require updating in this respect.</p> <p>NPPF removes the need to undertake impact assessments in relation to office floorspace proposals. It is not considered vital to update Policy CS12 to reflect this change as NPPF will supersede the Core Strategy policy in this respect, and up to date guidance regarding implementing CS12 will be set out in a Supplementary Planning Document.</p>
8. Promoting healthy and safe communities	The Core Strategy meets the requirements set out in this chapter.
9. Promoting sustainable transport	The Core Strategy meets the requirements set out in this chapter.
10. Supporting high quality communications	<p>Whilst the Core Strategy broadly meets the majority of requirements set out in this chapter, the Local Plan does not specifically set out how digital infrastructure will be delivered. However policies relating to utilities and telecommunications are set out in the Sites and Policies document, and any review of these policies would need to consider whether an update is required to address delivery of digital infrastructure.</p>
11. Making effective use of land	The Core Strategy meets the requirements set out in this chapter.
12. Achieving well-designed places	<p>The Core Strategy meets the requirements set out in this chapter. Consideration should be given to whether evidence supports the use of the Government's optional technical housing standards. If this indicates that they would be appropriate, then any update of the Core Strategy could include a policy to support the application of these standards within Rotherham.</p>
13. Protecting Green Belt land	The Core Strategy meets the requirements set out in this chapter.
14. Meeting the challenge of climate change, flooding and coastal change	<p>The Core Strategy broadly meets the requirements set out in this chapter.</p> <p>More up to date local evidence is available regarding surface water flood risk within Rotherham, and this merits an update to policies in conjunction with reviewing run off rate requirements and the drainage hierarchy.</p> <p>NPPF does set out that major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate. Local Plan policies do not specifically set out the requirements established in this paragraph; however the Council has published the 'South Yorkshire Interim Local Guidance for Sustainable Drainage Systems' which provides guidance for local standards and together with the Non-Statutory Technical Standards strongly promotes the use of Sustainable Drainage Systems. Any update to policies provides an opportunity to update policy regarding sustainable drainage systems.</p>
15. Conserving and enhancing the natural environment	The Core Strategy meets the requirements set out in this chapter.
16. Conserving and enhancing the historic environment	The Core Strategy meets the requirements set out in this chapter.
17. Facilitating the sustainable use of minerals	The Core Strategy meets the requirements set out in this chapter.

**Table 2: Assessment of Core Strategy against national planning policy**

Policy	Summary assessment
Policy CS 1 Delivering Rotherham's Spatial Strategy	There is no evidence that the overall strategy, the hierarchy of settlements or parts 2 to 4 of the policy (dealing with the strategic allocation, the broad location for growth and the new community at Waverley) requires updating. However an update may be required to part 1 to reflect the implications of changes to the housing requirement following introduction of the standard method for calculating housing need. An update to policies may also require an extension of the plan period to meet requirements of NPPF.
Policy CS 2 Delivering Development on Major Sites	Whilst a fundamental update of this policy is not required, there is potential to strengthen the policy with regard to the circumstances when masterplanning will be required for sites (taking account of the now adopted Sites and Policies document).
Policy CS 3 Location of New Development	The policy remains appropriate, addressing key issues which remain compliant with national planning policy.
Policy CS 4 Green Belt	The policy remains compliant with NPPF and a fundamental update of this policy is not required. There is potential to revise policy to reflect the comprehensive Green Belt review undertaken to support preparation of the Local Plan, and to changes to the Green Belt boundary which have been implemented by adoption of the Sites and Policies document.
Policy CS 5 Safeguarded Land	The policy remains compliant with national policy and a fundamental update of this policy is not required; however there is potential to reflect the identification of Safeguarded Land in the adopted Sites and Policies document.
Policy CS 6 Meeting the Housing Requirement	An update may be required to reflect the implications of changes to the housing requirement following introduction of the standard method for calculating housing need.
Policy CS 7 Housing Mix and Affordability	An update may be required to ensure that the Policy reflects the latest evidence regarding affordable housing in Rotherham and national policy regarding affordable housing, along with any implications arising from the updated SHMA (to be completed). Consultation with Development Management indicates the importance of housing standards to delivering quality development and support for considering whether to incorporate national optional housing standards into the Local Plan.
Policy CS 8 Gypsy and Traveller Accommodation	As part of reviewing the borough's housing requirement, and in view of the likely extension of the plan period as part of any update, up to date evidence regarding Gypsy and traveller housing needs will be required. This may result in an update to this policy being required to ensure compliance with NPPF and "Planning policy for traveller sites" (2015).
Policy CS 9 Transforming Rotherham's Economy	There are no changes in circumstances which require an update to this policy; however given the relationship between housing growth economic development, an update may be required dependent upon the implications arising from any update to the borough's housing requirement.
Policy CS 10 Improving Skills and Employment Opportunities	The policy remains compliant with national policy and there are no changes in circumstance which indicate the need for an update.
Policy CS 11 Tourism and the Visitor Economy	The policy remains compliant with national policy and there are no changes in circumstance which indicate the need for an update.
Policy CS 12 Managing Change in Rotherham's Retail and Service Centres	There is no evidence that the hierarchy of town and district centres or retail floorspace requirement requires updating. The policy broadly remains compliant with national policy and a fundamental update of this policy is not required.

Policy	Summary assessment
	Whilst NPPF removes the need to undertake impact assessments in relation to office floorspace proposals, it is not considered vital to update Policy CS12 to reflect this change as NPPF will supersede the Core Strategy policy in this respect, and up to date guidance regarding implementing CS12 will be set out in a Supplementary Planning Document.
Policy CS 13 Transforming Rotherham Town Centre	The policy remains compliant with national policy and there are no changes in circumstance which indicate the need for an update.
Policy CS 14 Accessible Places and Managing Demand for Travel	The policy remains compliant with national policy and there are no changes in circumstance which indicate the need for an update.
Policy CS 15 Key Routes and the Strategic Road Network	The policy remains compliant with national policy and there are no changes in circumstance which indicate the need for an update.
Policy CS 16 New Roads	The policy remains compliant with national policy and there are no changes in circumstance which indicate the need for an update.
Policy CS 17 Passenger Rail Connections	The policy remains compliant with national policy and there are no changes in circumstance which indicate the need for an update.
Policy CS 18 Freight	The policy remains compliant with national policy and there are no changes in circumstance which indicate the need for an update.
Policy CS 19 Green Infrastructure	The policy remains compliant with national policy and there are no changes in circumstance which indicate the need for an update; however there is potential to clarify the operation of the 'net gain' principle.
Policy CS 20 Biodiversity and Geodiversity	The policy remains compliant with national policy and there are no significant changes in circumstance which indicate the need for an update.
Policy CS 21 Landscape	The policy remains compliant with national policy and no update is required, although there is potential to remove reference to Areas of High Landscape Value as this designation was not taken forward in the Sites and Policies document.
Policy CS 22 Green Space	The policy remains compliant with national policy and there are no changes in circumstance which indicate the need for an update.
Policy CS 23 Valuing the Historic Environment	The policy remains compliant with national policy and there are no changes in circumstance which indicate the need for an update.
Policy CS 24 Conserving and Enhancing the Water Environment	The policy requires updating to be consistent with the hierarchy of drainage options set out in Planning Practice Guidance.
Policy CS 25 Dealing with Flood Risk	The policy requires updating to reflect up to date evidence regarding climate change and surface water flood risk, and to review run off rate requirements.
Policy CS 26 Minerals	The policy remains compliant with national policy; however there may be opportunities to consider how the policy could be updated to move towards a net zero climate change approach. This recognises the continuing challenges of climate change, the importance of reducing carbon emissions and reducing reliance on fossil fuels. There may also be opportunities to better reflect how the Mineral Safeguarding Areas have been taken forward through the Sites and Policies document.
Policy CS 27 Community Health and Safety	The policy remains compliant with national policy and there are no changes in circumstance which indicate the need for an update.

Policy	Summary assessment
Policy CS 28 Sustainable Design	The policy remains compliant with national policy and there are no changes in circumstance which indicate the need for an update.
Policy CS 29 Community and Social Facilities	The policy remains compliant with national policy and there are no changes in circumstance which indicate the need for an update.
Policy CS 30 Low Carbon & Renewable Energy Generation	The policy remains compliant with national policy; however there may be opportunities to consider how the policy could be updated to move towards a net zero climate change approach. This recognises the continuing challenges of climate change, the importance of reducing carbon emissions and reducing reliance on fossil fuels.
Policy CS 31 Mixed Use Areas	The policy remains compliant with national policy and there are no changes in circumstance which indicate the need for an update.
Policy CS 32 Infrastructure Delivery and Developer Contributions	The policy remains compliant with national policy and there are no changes in circumstance which indicate the need for an update.
Policy CS 33 Presumption in Favour of Sustainable Development	This policy requires updating to reflect the amendments to the presumption in favour of sustainable development in revised NPPF.
Policy CS 34 Housing delivery and ongoing co-operation	This policy will require updating to reflect actions which have been taken since adoption of the Core Strategy. It will also require amending to reflect the introduction of the housing delivery test and the implications arising from performance against this test.