

**ROTHERHAM LOCAL PLAN**

**CORE STRATEGY 2013 - 2028**

**Five Year Review Refresh**

**August 2023  
(with Postscript May 2024)**

## Section 1: Background

1. Rotherham Council adopted its Local Plan Core Strategy 2013 – 2028 on 10 September 2014. 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 an initial review was undertaken in July 2019 and reported to Rotherham Council’s Cabinet. Work on a partial update to the Core Strategy began in early 2020 but was curtailed by the Covid-19 pandemic and the need to prioritise other workstreams. In addition, national planning policy was revised in 2021, necessitating this refresh of the 2019 Core Strategy review. This 2023 review therefore builds on and refreshes the previous 2019 review, bringing it up to date to reflect the 2021 National Planning Policy Framework (NPPF) and other policy and strategic developments.
3. The subsequent sections of this review reflect updates to the NPPF and other changes in National policy. Rotherham forms part of the South Yorkshire Mayoral Combined Authority (MCA) – plans and strategies for South Yorkshire inform this review. Updated strategies, plans and updated evidence bases have also been produced for Rotherham. This **plan review report is structured** as follows:
  - Section 2 - key national planning policy changes.
  - Section 3 - Environment Act requirements.
  - Section 4 - climate change emergency and emissions targets.
  - Section 5 – energy efficiency and generation.
  - Section 6 – flood and water management.
  - Section 7 – housing requirements.
  - Section 8 – housing needs of different groups.
  - Section 9 – spatial distribution of housing land.
  - Section 10 – economic recovery and growth.
  - Section 11 – scale and location of employment land.
  - Section 12 – infrastructure requirements and delivery.
  - Section 13 – Census results.
  - Section 14 – appeals performance.
  - Section 15 – annual monitoring results.
  - Section 16 – duty to cooperate findings.
4. **Further assessment of the Core Strategy policies and the requirements of the 2021 NPPF are set out at Appendices A and B.** Each of the sections of the NPPF are assessed in turn at Appendix A and all the Core Strategy policies are assessed at Appendix B. These two exercises complement and inform the review sections set out above.
5. **Overall conclusions from this plan review** are set out in Section 17.

## Section 2: Key National Planning Policy Changes

### Background

6. Planning policies for England are set out in the National Planning Policy Framework (NPPF) which was updated and issued in July 2021. Key changes are outlined below with reference to specific NPPF paragraphs (in brackets).
7. The 2021 NPPF now reflects the UK's commitment to the 17 Global Goals for **Sustainable Development** in the period to 2030 (para 7). Changes were also made to the presumption in favour of sustainable development in relation to plan making – inserting the need for growth to align with infrastructure, improving the environment and on climate change mitigation and adaptation (Part a of para 11).
8. A stronger emphasis is placed on **design and achieving beautiful places**. The social objective of the planning system (para 8b) was amended to include the fostering of “well-designed, beautiful and safe places”. A requirement was added (para 128) that to “provide maximum clarity about design expectations at an early stage, all local planning authorities should prepare design guides or codes”. Similarly, a test for well-designed development was introduced – “development that is not well-designed should be refused, especially where it fails to reflect local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes” (para 134). Tree lined roads were also included as a necessity for creating beautiful places (para 131).
9. The **National Design Guide** was published in January 2021, with an emphasis on achieving well designed places and outlining the Government's priorities for well-designed places. The **National Model Design Code** issued at the same time provides detailed guidance on the production of design codes, guides, and policies to promote successful design. The Model Design Code expands on ten characteristics of good design set out in the Design Guide. Through preparing local plans and supporting supplementary planning guidance, local planning authorities should develop an overarching design vision and objectives that can inform design codes, guides and other tools that inform the design of the built and natural environment in their area.
10. Requirements for **planning and flood risk** (para 161) confirm that plans should manage any residual flood risk by using opportunities provided by new development and “improvements in green and other infrastructure to reduce the causes and impacts of flooding (making as much use as possible of natural flood management techniques as part of an integrated approach to flood risk management)”. Reflecting the Environment Act 2021 (see section 3 of this report) there is greater emphasis on **improving biodiversity** as an integrated part of development design, and where appropriate, improving public access (para 180).

### Assessment

11. Core Strategy Policy CS 33 sets out a Presumption in Favour of Sustainable Development in the Local Plan. The policy contains no locally specific detail regarding the ‘presumption’ which is adequately covered in the NPPF. Policy CS 1 sets out a spatial strategy for Rotherham which provides a local policy approach for achieving a sustainable pattern of development. There is existing emphasis in the CS on improving the environment and on climate change mitigation and adaptation.
12. Section 4 in this Review, Climate Change Targets, explains the principles underpinning the spatial strategy set out in the Core Strategy at Policy CS1. This requires that most

new development will take place within Rotherham's urban area and at Principal Settlements for Growth. Urban focussed and compact development patterns (within and close to existing built-up areas) offers the greatest scope to re-use land and buildings; make the most efficient use of existing infrastructure capacity and utility networks; support town centres; reduce greenhouse gas emissions with reduced travel demand and the scope to promote public transport use, cycling and walking; and maximise accessibility between homes, services, and jobs.

13. The need for growth to align with infrastructure is addressed at Section 12 of this Review, flood risk and water environment at Section 6 and biodiversity as part of Section 3.
14. Objective 14 of the Core Strategy is for 'Design' and states that "*By the end of the plan period, new development built to sustainable design standards will have contributed to the creation of safe, accessible, and well managed places, buildings, and public spaces. The design of new development will have contributed to and enhanced the distinctive townscape and character of heritage features within communities*".
15. Core Strategy Policy CS 28 provides a policy approach requiring development to be well-designed. The supporting text (paragraph 5.7.28) sets out that "planning briefs, design codes and masterplans will be used to implement the policy in areas of significant change". Policy SP 55 in the Sites and Policies document establishes 'Design Principles' which require that a site and its context has been sufficiently analysed and understood during the design process and that this knowledge has been used in the proposed development design.
16. Further advice is available within the South Yorkshire Residential Design Guide (January 2011) and Supplementary Planning document no. 4, Householder Design Guide (adopted June 2020) which sets out detailed advice and guidance on domestic household extensions. Policy CS 2 'Delivering Development on Major Sites' requires "detailed master planning and the preparation of appropriate Design Codes..... prior to the submission of any planning application, to bring forward the strategic allocation and broad location for growth in a coherent way". An appropriate level of community engagement is required in the preparation of masterplans.
17. In 2022 SYMCA commissioned Tibbalds to undertake a scoping review of the current SYRDG to understand whether it should be updated, the scale of any update as well as providing options related to cost of an update. This Scoping report is therefore intended to scope potential changes to the current SYRDG and provides options for possible approaches to providing refreshed design guidance, including cost and format. Discussions with the Local Authorities' Heads of Planning identified a number of concerns around progressing with an update of the SYRDG at this time, focused on uncertainties with regard to emerging planning reforms and their implications; budget and resource implications given current pressures on local government finances; and timing in terms of guidance being available to inform sites coming forward for development in the short term. In this context taking forward an update of the SYRDG was not considered to be the most effective use of resources at this time, although there was broad agreement to progress with an alternative approach. A Residential Design Charter and associated activities are proposed which could be progressed at pace and with minimal cost and resource implications, but which would address key shared residential design issues, improve awareness and understanding, and promote shared information, learning and joint working. This would complement the existing and future

design policies and guidance of Local Authorities and supporting tools which are being utilised (such as local Design Panels).

**Conclusions – Key National Planning Policy Changes**

Policy CS 33 should be deleted.

Policy CS 28 provides an overarching design vision and objectives and does not need to be updated.

Policy CS 2 requires Design Codes for major sites and does not need to be updated.

It is recognised that “all local planning authorities should prepare design guides or codes consistent with the principles set out in the National Design Guide and National Model Design Code, and which reflect local character and design preferences” (NPPF paragraph 12). At present a borough-wide design guide and/or code could be prepared as a Supplementary Planning Document. NPPF paragraph 129 explains that “Design guides and codes can be prepared at an area-wide, neighbourhood or site-specific scale, and to carry weight in decision-making should be produced either as part of a plan or as supplementary planning documents.” Effective community engagement is a key component of the production process. There are different ways in which design guides/codes can be prepared and overall, a ‘Rotherham’ borough-wide approach needs to be developed and then produced to enable and inform future policy development. Alternatively, the Council could work with SYMCA on a South Yorkshire Residential Design Charter, could form part of the approach.

**Postscript May 2024**

The five year review refresh was produced in August 2023. Since this time further work has been undertaken on Social Vale in Rotherham and the NPPF has been updated twice. Due to their timing neither of these were reflected in this review refresh document.

A Social Value Local Needs Analysis (2023) for Rotherham MBC was prepared by the Social Value Portal (SVP) in 2023, followed by a Policy Review in February 2024. Drawing on both reports an evidence based report was prepared to underpin the development of Local Plan Policy on Social Value - Embedding Social Value in Planning at Rotherham MBC (SVP, March 2024). This work has collectively sought to ensure that planning plays a key role in ensuring that social value is maximised across the borough of Rotherham.

The September 2023 update to the NPPF had a particular focus on onshore wind development in England. Footnote changes have added that supplementary planning documents can also now be used to identify suitable areas for wind energy, as opposed

to only development plans. A new footnote was also included whereby planning impacts now only have to be 'appropriately' addressed rather than 'fully' and the proposal must have community 'support' rather than 'backing.' These changes to national policy were limited in scope.

December 2023 revisions to the NPPF have further updated national planning policy. Key changes included that there is no requirement for Green Belt boundaries to be reviewed or changed when plans are being prepared or updated. The updated national policy confirms that the standard method for calculating housing need is an "advisory starting point" for local authorities in generating housing numbers and indications are given of the types of local characteristics which may justify the use of an alternative method of assessing housing need. Changes to housing land supply periods were also introduced. This included that Local Authorities with an up-to-date local plan will no longer need to continually show a deliverable five-year housing land supply where the housing requirement, as set out in strategic policies, is less than five years old. Councils will also no longer have to provide five-year housing land supply buffers of 5% or 10% - under delivery measured by the Housing Delivery Test still requires a 20% buffer. Increased emphasis/support in the NPPF is given to small sites for community-led housing and self-build and custom build housing; meeting the need for retirement housing, housing-with-care, and care homes; the availability of land for food production; and to the importance of energy efficiency through adaptation of buildings.

The social value evidence base work and NPPF changes will be directly considered, where relevant, in the review/development of specific proposed core strategy policy changes and in the related preparation of a consultation document for the Core Strategy Review.

## Section 3: Environment Act Requirements

### Background

18. The 2021 Environment Act aims to improve the country's air quality, restore natural habitats, increase biodiversity, reduce waste, and make better use of resources. A key provision was the introduction of a **Biodiversity Net Gain** (BNG) requirement, with an obligation for developers to ensure all new proposals feature at least a 10% improvement to biodiversity (due to become mandatory from November 2023). Where this cannot be delivered on site, developers will be able to contribute to offsite biodiversity increase.
19. **Local Nature Recovery Strategies** were also introduced as a new, England-wide system of spatial strategies that will establish priorities and map proposals for specific actions to drive nature's recovery, provide wider environmental benefits and support the delivery of nature based measures to support climate change adaptation. All public authorities are to "have regard" to relevant Local Nature Recovery Strategies which will support a Nature Recovery Network. There is an enhanced Biodiversity Duty on each Local Authority and public authorities must also duly consider what actions they could take from time to time to "*further the general biodiversity objective.*" Biodiversity reports should be published, stating what has been done to comply with these duties.
20. In terms of 'networks' a natural capital assessment mapping exercise has been undertaken over the whole of South Yorkshire (including Rotherham). The **South Yorkshire natural capital and biodiversity mapping**, July 2021, is a detailed mapping evidence base of South Yorkshire's natural environment, providing detailed evidence of the benefits that South Yorkshire's natural ecosystems provide and the opportunities to enhance them. It will be used to inform South Yorkshire's upcoming Local Nature Recovery Strategy to be prepared by the South Yorkshire Mayoral Combined Authority as "responsible authority", in conjunction with the four South Yorkshire local authorities and other stakeholders.
21. Core Strategy Objective 10, Biodiversity/ geodiversity, states that "*By the end of the plan period, the borough's significant biodiversity and geodiversity sites will have been identified, designated, conserved, managed, and enhanced. Opportunities for expanding, linking, and creating significant sites will have been identified and delivered. The geodiversity, habitats, and greenspace eco-systems of the wider environment will have been conserved, enhanced, and managed by implementation of the plan's policies. The borough's best and most versatile agricultural land will have been protected, wherever possible, to promote local food production.*"
22. Policy SP33 'Conserving and Enhancing the Natural Environment', in the Sites and Policies DPD presents a hierarchy for dealing with all development stating: "*Development should conserve and enhance existing and create **new** features of biodiversity and geodiversity value ...suitable mitigation measures... adequate compensation... The aim of mitigation and compensation should be to respond to impact or loss with something of **greater value**; the minimum requirement will be no net loss.*"
23. There is reference to Biodiversity Net Gain and the minimum 10% improvement in the **Rotherham Local Plan Supplementary Planning Document No. 11 Natural Environment**, adopted in June 2021 (SPD 11). The Dearne Valley Green Heart 'Nature Improvement Area' (NIA), which includes parts of Rotherham, Barnsley, and Doncaster boroughs, is also referred to in SPD 11 and its designation is included on the Policies Map. NIAs were established to help address ecological restoration at a landscape-scale



to improve biodiversity, ecosystems and our connections with the natural environment identified by the Natural Environment White Paper (2011) and taking forward recommendations identified in the Lawton Review: Making Space for Nature (2010).

24. Supplementary Planning Documents (SPDs) on Developer Contributions, Biodiversity Net Gain, Trees, Preparing a Soils Strategy and Development in the Green Belt (Revised) were adopted in June 2023. The Biodiversity Net Gain SPD sets out the Council's approach to seeking Biodiversity Net Gain (BNG) in line with the requirements introduced by the Environment Act. This reflects Objective 10 of the Core Strategy which aims to manage the Borough's biodiversity through planning policies and supports the Council's Climate Change Action Plan. The BNG SPD:
- Introduces the BNG Metric – a habitat-based approach designed to provide ecologists, developers, planners, and other interested parties with a means of assessing changes in biodiversity value (losses or gains) brought about by development or changes in land management.
  - Sets out how to assess the biodiversity value of a site and the potential impacts arising from new development on the natural environment.
  - Sets out how to apply the mitigation hierarchy and clarifies that where irreplaceable habitats cannot be offset, then planning permission should be refused, in accordance with national and local planning policy.
  - Sets out how to calculate Biodiversity Net Gain.
  - Provides a biodiversity checklist for applicants.

### Assessment

25. Core Strategy Policy CS 20 aims to conserve and enhance Rotherham's natural environment. Criterion L) includes that ".....development decisions will safeguard the natural environment and will incorporate best practice including biodiversity gain...". From November 2023 there will be a national legislative requirement for biodiversity net gain. As a strategic policy CS 20 is consistent with the emphasis of both the Environment Act and the 2021 NPPF on improving biodiversity and achieving gains.
26. Local Nature Recovery Strategies are a new requirement, and it will take time for the new strategies to be produced - this is not in place now but will inform a future update of the Core Strategy. Criterion f) of Policy CS20 does support "the production of further relevant biodiversity and ecological network strategies identified by local partnerships, to deliver the restoration and expansion of priority habitats, including within identified biodiversity opportunity areas". Further SPDs are proposed to be adopted at Cabinet in July 2023 including Trees, Preparing a Soils Strategy, Biodiversity Net Gain +10% and Developer Contributions.



### **Conclusions – Environment Act Requirements**

There are no significant concerns about the existing content and requirements of Policy CS20. Biodiversity gain and the production of biodiversity and ecological network strategies are supported. The current CS 20 supporting text could be brought up to date in terms of references to net gain and Local Nature Recovery Strategies to aid policy implementation.

A new Biodiversity Net Gain SPD has been recently adopted which along with the Trees SPD, and Preparing a Soil Strategy SPD will all aid policy implementation and support the Council in embedding the enhanced Biodiversity Duty in its application.

Whilst a clearer emphasis in policy that ecological networks 'should be conserved, enhanced and expanded' could be provided, this would be 'in principle' and not significantly change the policy approach. The further spatial detail that a Local Nature Recovery Strategy will provide in the future would produce the key evidence required to review and potentially strengthen the policy approach. It is acknowledged that the Natural Capital Assessment mapping exercise does provide updated evidence – this is feeding into the Local Nature Recovery Strategy.

## Section 4: Climate Change Emergency and Emissions Targets

### Background

27. The Core Strategy was prepared and adopted within the context of the Climate Change Act 2008 which included a statutory target of reducing carbon dioxide emissions to at least 100% below 1990 levels by 2050 and a framework for climate change adaptation. To meet these targets, the UK Government sets five-yearly carbon budgets.
28. The TCPA and RTPi publication, '**The Climate Crisis A Guide for Local Authorities on Planning for Climate Change**' January 2023, provides helpful guidance and explanation that "the Climate Change Committee's Sixth Carbon Budget, introduced into law in 2021, sets a target to reduce UK greenhouse gas emissions by 78% by 2035 (compared with 1990 levels). Meeting the Sixth Carbon Budget, which delivers three-quarters of the emissions reductions needed to reach net zero by 2050, is the only way that the UK can deliver on its contribution to the Paris Agreement. It requires the UK to reduce emissions by 2.25% of 1990 levels per year."
29. '**Rotherham Council Responding to the Climate Emergency**', June 2020 - sets dual targets to reduce carbon emissions – the Council's carbon emissions to be at net zero by 2030 and Borough-wide carbon emissions to be at net zero by 2040. The "Our Climate Change Plan" identifies seven climate themes to focus action.

### Assessment

30. The Core Strategy has a fundamental role to play in addressing the climate challenge. The Core Strategy Vision includes that "*Rotherham will be successful in mitigating and adapting to future changes in climate*" and one of the five broad aims of the Core Strategy is "*To reduce the borough's contribution to, and adapt to the effects, of climate change.*" Objective 13, Carbon reduction and renewable energy, states that "*By the end of the plan period, the borough's carbon footprint will have been reduced from current levels. Implementation of the Plan's policies will have secured an increased proportion of energy generation via renewable and low carbon means and will have promoted energy efficiency, energy conservation and the use of sustainable construction techniques*".
31. Further sections in this review cover important aspects of climate change mitigation and adaptation in relation to energy, biodiversity and flood and water management. The supporting text to Policy CS 1 Core Strategy explains (at 5.2.5) that: "Our strategy will create sustainable communities by:
  - concentrating development in the Rotherham urban area, principal settlements for growth and on key public transport corridors;
  - making best use of existing infrastructure, services, and facilities;
  - reducing the need to travel and, where viable and sustainable, using previously developed land first;
  - ensuring that communities are, as far as possible, self-contained;
  - and safeguarding and enhancing our environmental assets".
32. The Core Strategy does not include an overarching/strategic climate change policy. The emphasis on addressing climate change runs as a key thread through different policy areas and there are specific policies on flood risk, the water environment and low carbon and renewable energy generation that amongst other policies are of critical importance to Rotherham's Climate Emergency response.

33. A partial update offers an opportunity to further clarify and embed the importance of addressing climate change in the spatial strategy in addition to the wider policies of the Core Strategy. This would be within the context of the UN Sustainable Development Goals (see paragraph 7 above) and the UK and Paris Agreement targets (see para 22 above). This emphasises the critical importance of planning and the Core Strategy in supporting the transition to a net-zero and resilient future and in meeting Rotherham's Climate Emergency and net zero targets.

### **Conclusions - Climate Change Emergency and Emissions Targets**

The Spatial Strategy included at CS 1 remains a very relevant strategic planning response to climate change. For example, a more dispersed pattern of development would likely lead to an increase in emissions, the overall existing strategy promotes a 'climate friendly' approach. The issues, vision and objectives set out in the Core Strategy provide a clear focus on climate change mitigation and adaptation in the Borough. Different policy requirements are then set out throughout the Core Strategy as part of the plan's overarching and cross-cutting approach to addressing climate change.

The Core Strategy's approach to climate change should be further strengthened, by reviewing and updating the supporting text to Policy CS 1 to reinforce the cross-cutting emphasis on climate change in the Core Strategy in the spatial strategy policy.

## Section 5: Energy Efficiency and Generation

### Background

34. Updated **Building Regulations** requirements came into force in June 2022 and play a key role in securing better energy efficiency. New standards were set out in Parts L, F, O, and S detailing improvements needed to increase building energy efficiency and supporting systems. The uplift to Part L was introduced as an interim measure to reduce carbon emissions by 31%, compared to the previous Building Regulations requirements. The **Future Homes Standard** is intended to deliver homes that are zero-carbon ready and reduce carbon dioxide emissions by 75-80%. It is expected that a consultation on the full technical specification of the Future Homes Standard will be issued in 2023. The standard is then expected to be introduced into legislation in 2024 and implemented in 2025.
35. Increasing the amount of energy (both electricity and heat) generated from renewable and low-carbon sources is one of the important ways in which carbon reduction targets can be delivered at the local level. The **2020 Energy White Paper** set out plans for investment and job creation for an energy generation transition towards renewable sources to achieve net-zero requirements. The **UK decarbonisation strategy (Net Zero Strategy: Build Back Greener, October 2021)** is largely based on the electrification of transport and heat provision and on decarbonising electricity generation, so that the UK is powered entirely by clean electricity by 2035. The **British Energy Security Strategy** (April 2022) aims to improve energy efficiency and to accelerate the transition away from oil and gas with the roll out of new renewable schemes. Progress towards Net Zero is seen as being fundamental to energy security, cleaner and cheaper energy and to creating jobs in the energy sector.
36. The **Powering Up Britain** strategy was issued at the end of March 2023, described as the government's blueprint for the future of energy in this country. It brings together the Energy Security Plan, and Net Zero Growth Plan and aims to diversify, decarbonise, and domesticate energy production by investing in renewables and nuclear, "to power Britain from Britain".
37. **The Sheffield City Region Energy Strategy**, June 2020 - sets out the vision, goals, policies, and targets for South Yorkshire to have "*a clean, efficient and resilient energy system, which supports a healthier environment for people to live, work and visit, and which drives our transition to a low carbon economy.*"
38. **Rotherham's Climate Emergency** and emissions targets (see paragraph 28 above and 39 below) and the NPPF also support the transition to a low carbon future - plans should have a positive strategy to promote energy from renewable and low carbon sources, that maximises the potential for sustainable development, whilst ensuring adverse impacts are addressed satisfactorily. The NPPF also requires plans to "*consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure their development*"; and to "*identify opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems and for co-locating potential heat customers and suppliers.*"

### Assessment

39. Policy CS 30 'Low Carbon & Renewable Energy Generation' of the Core Strategy provides a positive policy approach and strategy that promotes energy from renewable

and low carbon sources and promotes energy efficiency. Part 1 sets out policy seeking to reduce carbon dioxide emissions. Part 2 sets out detailed policy relevant to proposals that produce renewable energy. Criteria for considering unacceptable adverse effects are set out for the development of renewable and low carbon sources of energy, particularly from community owned projects.

40. The Council's 2019 motion declaring a climate emergency resolved, amongst other things, to:

- Propose an informed target for the Council's carbon reduction by 2025, and to develop a "Carbon Action Plan" towards these goals.
- Develop a strategy for RMBC to play a leadership role in promoting community, public and business partnerships in reducing carbon emissions.
- Pledge to ask partner organisations across Rotherham to support the Council by making clear commitments to dealing with this climatic crisis.

### **Conclusions – Energy Efficiency and Generation**

There are no fundamental concerns about Policy CS30, it is consistent with the NPPF.

Consideration should be given as how the policy and its supporting text could be updated and strengthened to further support the move towards a net zero carbon approach and deliver Rotherham's carbon reduction targets and response to the Climate Emergency. Updating should consider:

- The Council's declaration of a climate emergency of reducing Rotherham's borough-wide carbon emissions to net zero by 2040.
- The submission of energy statements with planning applications to demonstrate how proposals have sought to minimise carbon emissions.
- Support for district heat networks and combined heat and power (CHP) or combined cooling heat and power (CCHP) and connections of developments to these in the future.
- Where there is an existing or proposed district heat network, development involving ten or more dwellings and/or over 1,000m<sup>2</sup> of non-residential floorspace should be required to connect into the heat network, or be designed to do so, unless it can be demonstrated that there are more effective alternatives for minimising carbon emissions, or such connection is impracticable or financially unviable.
- The provision of electric vehicle charge-points.

## Section 6: Flood and Water Management

### Background

41. Requirements for '**planning and flood risk**' in the 2019 and 2021 (paragraph 161) **NPPF** emphasise the role of green infrastructure and natural flood management techniques for integrated flood risk management. The current and future impacts of climate change and all sources of flooding should be taken into account.
42. The Council is a Lead Local Flood Authority. An updated '**Local Flood Risk Management Strategy**' was published in February 2022 setting out how flood risk from 'local sources' will be managed in a way that makes best use of resources. The Strategy reflects surface water flood modelling carried out by the Environment Agency to indicate the broad areas likely to be at risk of surface water flooding, as shown on the **Flood Map for Surface Water** (FMfSW).
43. The '**Connected by Water Action Plan**' is a catchment wide flood plan covering the whole of South Yorkshire. It outlines the actions to be undertaken to reduce flood risk, mitigate climate change and support climate resilient communities across South Yorkshire. First launched in January 2022, the Action Plan has been updated in 2023 and now includes over 100 projects to better protect over 25,000 homes and businesses, and regionally significant infrastructure across South Yorkshire.

### Assessment

44. Core Strategy Objective 12, Managing the water environment, states that by the end of the plan period, implementation of the plan's policies to regulate development will have conserved, managed, and enhanced the borough's water environment and contributed to the wider integrated management of water catchments. The risks of pollution of rivers and water resources, depletion of water supplies, flooding and harm to biodiversity and leisure interests will have been minimised by implementation of the plan's policies.
45. Policy requirements for flood and water managements are set out in Policy CS 24, Conserving and Enhancing the Water Environment and Policy CS 25, Dealing with Flood Risk. Both policies are broadly consistent with the NPPF. Further evidence is available on the implications of climate change and surface water flood risk. Local and South Yorkshire strategies and plans provide an updated context for the policy approach.
46. National **Planning Practice Guidance** (PPG) on Flood Risk and Coastal Change was subject to a significant refresh in 2022, bringing it up to date and in line with the latest policy position on flood risk introduced in the updates to the National Planning Policy Framework in 2018 and 2021. This included guidance on the types of sustainable drainage systems to be considered with preference given to multi-functional sustainable drainage systems.

### **Conclusions – Flood and Water Management**

Whilst the Core Strategy policies broadly align with national policy, there is a need to update how local flood risk within the borough will be managed, reducing the impacts of climate change.

Policy CS 24 requires updating to be consistent with the hierarchy of drainage options set out in the PPG and to reflect mandatory requirements for the implementation of Sustainable Urban Drainage Systems (SuDS).

Revisions to Policy CS25 should reflect up to date evidence regarding climate change and surface water flood risk, and the provision of sustainable drainage systems in development proposals.



## Section 7: Housing Requirements

### Background

47. Revisions to the NPPF in 2018 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). This method uses household projections as a basis, making adjustments for affordability. Planning Practice Guidance requires this standard approach to be used by planning authorities, in addition to them undertaking assessments of the number of households who lack their own housing, or who cannot afford to meet their housing needs in the market.
48. 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.
49. The Government also introduced an annual **Housing Delivery Test** which measures net additional dwellings against the number of homes required. The Test is a percentage measurement of the number of net homes delivered against the number of homes required over a rolling three-year period. The test measures against the lower of the latest adopted housing requirement or the minimum annual local housing need figure which is based on Office for National Statistics household projections. Authorities which do not 'pass' the Test – i.e., the percentage of new homes delivered falls below 95% of the homes required, are required to produce, and publish an action plan to explain how they will rectify the shortfall.
50. The Core Strategy makes provision through Policy CS 6 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 by the Government-appointed Inspector who carried out the independent examination of the Core Strategy.
51. A housing requirement figure should be set for the whole Rotherham Borough area. Within this overall requirement strategic policies should also set out a housing requirement for **designated neighbourhood areas** which reflects the overall strategy for the pattern and scale of development and any relevant allocations (paragraph 66, NPPF).

### Assessment

#### *Unmet Needs in Neighbouring Areas*

52. Rotherham Council has been approached by other local authorities to consider whether Rotherham could accommodate part of their housing growth. However, the Council has identified that it is unable to offer any capacity to meet additional housing needs from elsewhere (see Section 15 Duty to co-operate findings).

#### *Housing Delivery Test*

53. The first Housing Delivery Test results were published in February 2019. Rotherham's results showed that 92% of the target was delivered, requiring the Council to prepare a housing delivery action plan. However, the AMR 2022 explained that for 2021 (results

released in January 2022) Rotherham passed the Test and no further action was required.

#### *Five Year Housing Land Supply*

54. Latest housing land monitoring (HLPS, 31 03 2022) establishes that Rotherham has a five year housing land supply of 6312 dwellings from 2022/23 to 2026/27. Based on the standard method based annual requirement for 554 dwellings there is an **11.4 year supply of housing**. This is a positive and healthy supply position. Updating also provides an opportunity for the Council to clarify that windfall development should align with the spatial strategy set out in CS1.
55. 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.

#### *Standard Method Housing Need*

56. The Local Housing Need figure derived from the Standard Method is a requirement for 554 dwellings per annum. There is a significant difference between the local housing need figure and the existing Core Strategy requirement of 850 net additional dwellings per annum over the plan period of 2013 to 2028. NPPF Paragraph 22 also requires that “strategic policies should look ahead over a minimum 15 year period from adoption.”

### **Conclusions - Housing Requirements**

Core Strategy Policy CS 6 should be updated to reflect the introduction of the standard method for calculating housing need which currently requires 554 new homes per annum and to clarify that windfall development of new homes will be supported where it is consistent with the Spatial Strategy set out in Policy CS1.

A revised plan period is required to ensure that the Core Strategy’s policies look ahead for a minimum of 15 years (from adoption of a Core Strategy update). A new housing requirement for a plan period of 2025 to 2040 would provide this.

The way in which housing requirements are provided for designated Neighbourhood Plan areas should be further considered.

## Section 8: Housing Needs of Different Groups

### Background

57. A 2018 **Strategic Housing Market Assessment (SHMA)** for Sheffield and Rotherham was produced in July 2019. Various data in the SHMA demonstrates how the local housing market functions across the local authority boundaries of Sheffield City Council (SCC) and Rotherham Metropolitan Borough Council (RMBC). The flow of people within and between Sheffield and Rotherham means this is a relatively self-contained housing market area. 75 per cent of moves originating in the Sheffield and Rotherham Housing Market (SRHM) are to another destination within the SRHM. The SHMA report provides detailed evidence on the structure and operation of the housing market.
58. Rotherham's 30 year Housing Strategy was published in December 2012 and sets out a long term vision for housing in the borough until 2043. It is refreshed every three years, to ensure it remains up to date and addresses the most recent challenges and opportunities and references the latest statistical evidence. The **Housing Strategy, 2022-2025** sets out six key priorities: high quality new homes; affordable homes to meet local need; investment in existing homes; bringing empty homes back into use; supporting people to live independently; and strengthening communities.
59. **Core Strategy Policy CS 7, Housing Mix and Affordability** sets out affordable housing requirements, and the methodology to be adhered to, should the applicant consider that there are good reasons to challenge development viability. This includes adhering to an 'open book' approach and specifying minimum evidence to be provided. A threshold of 15 dwellings is used in the current Policy CS7 with targets of 25% affordable homes on site. SPD guidance documents on Affordable Housing (SPD 9) and Development Viability (SPD ) were both published in June 2021. Further evidence base and data gathering to support these SPDs has been undertaken.
60. **Core Strategy Policy CS 8 Gypsy and Traveller Accommodation** identified a requirement to provide 8 pitches for Gypsy and Traveller communities, based on the draft South Yorkshire Gypsy and Traveller Accommodation Needs Assessment 2011 – 2016. Subsequently this study was completed, and the Sites and Policies Document identified a final requirement within Rotherham for 9 pitches. As set out in Section 7 a plan period of 2025 to 2040 would provide a fifteen year plan period for updated policies.

### Assessment

61. The SHMA and the updated Housing Strategy reinforce existing objectives and priorities in the Core Strategy, including the need for more affordable homes in Rotherham.

National policy requires that development proposals for market housing of 10 or more dwellings and all sites greater than 0.5 hectares should provide affordable housing. The Council has produced more recent evidence on affordable housing, viability and developer contributions further verifying the alignment of the guidance regarding viability appraisals with the approach set out in the Affordable Housing and Development Viability SPDs. Further considerations would include.

- Ensuring that there is equity in provision of affordable and market housing gross internal floorspace, and that affordable social housing provision is integrated with open market housing.
- Not normally accepting one bedroom dwellings or apartments in mixed tenure blocks as affordable housing.

- Clarifying how social rents will be set. Requiring developers to engage with the Council or its housing association partners in the first instance regarding the sale of S106 affordable social housing units.
  - The Council will only accept a financial payment in lieu of on-site provision in exceptional circumstances.
62. The Gypsy and Traveller, Travelling Showpeople and Boat Dwellers Accommodation Assessment 2021 provides updated evidence. It establishes a need to plan to accommodate between 5 and 7 pitches to meet Gypsy and Traveller needs to 2040; 12 residential plots for Travelling Showpeople to 2040; and 10 residential moorings for boat dwellers.
63. The South Yorkshire Residential Design Guide (January 2011) set out external space standards and internal space standards are set out in the ‘Technical housing standards – nationally described space standard.’

### **Conclusions – Housing Needs of Different Groups**

Policy CS 7, Housing Mix and Affordability should be updated to reflect latest national policy, the Council’s latest evidence on affordable housing, viability, and developer contributions and appropriate space standards.

Updating should consider amending the threshold from 15 to 10 dwellings and ensuring consistency between the NPPF, Local Plan policy and the adopted Affordable Housing and Development Viability Supplementary Planning Documents.

Policy CS 8, Gypsy, and Traveller Accommodation should be updated to reflect updated evidence and a revised plan period, ensuring compliance with the NPPF and national “Planning policy for traveller sites” (2015).

## Section 9: Spatial Distribution of Housing Land

### Background

64. Core Strategy Policy CS1 provides an indicative distribution of housing based on the settlement hierarchy. This is consistent with the housing requirements set out in Policy CS6 but indicative as the allocation of development sites was still subject to the Sites and Policies plan.
65. The **Rotherham Local Plan Housing Supply Assessment 2023 report** provides an assessment of housing completions and housing land supply in the borough of Rotherham. It draws on the evidence set out in the **Rotherham Housing Land Position Statement** (31 03 2022). The supply assessment report considers the projected supply and housing need requirements for the current plan period (to 2028) and for a potential extension period to 2040 and its findings include that:
- Based on an assessment of **completions to 2021/22** the proportion of new homes being built at Principal Settlements for Growth is on track relative to the CS1 distribution requirement. The level of completions for the Rotherham Area is notably lower than the indicative CS1 distribution, with no completions at Bassingthorpe Farm. For both principal settlements and local service centres the proportion of completions is higher compared to CS1 (though dwelling requirements and completions are relatively smaller in scale for local service centres).
  - The **projected supply of housing to 2028** would not achieve the indicative CS1 spatial distribution of new homes by settlement. However, the resulting projected distribution would be closer by 2028, compared to the distribution that has resulted from completions to 2021/22.
  - The spatial distribution of projected housing provision that would result from the **projected supply over an extended plan period to 2040** is very close to the distribution indicated in CS1, for all tiers and places in the settlement hierarchy. This includes Bassingthorpe Farm and the new community at Waverley. A sufficient overall amount of housing development would also result relative to need, with some flexibility.

### Assessment

66. The settlement hierarchy was established in an evidence based way to promote sustainable development. Given the national policy emphasis on promoting sustainable patterns of development and addressing climate change it is considered that the overall hierarchy remains appropriate to 2040. The distribution of growth has been examined through the Housing Supply Assessment 2023 report. In proportional terms more development is taking place lower down the settlement hierarchy than originally envisaged and indicated in the spatial strategy for the current plan period to 2028. By 2040 this is no longer the case and the indicative CS1 distribution would be achieved.
67. Delivery at Bassingthorpe Farm is the key factor influencing recent and projected levels of development for the Rotherham Urban Area. It will provide a sustainable urban extension for the wider Rotherham Urban Area providing around 2,400 new homes overall. The projected delivery period was always beyond the current Plan period (up to 2028), and it was anticipated that it would take twenty years to build out this new community. This strategic allocation also provides for around 10 hectares of employment land together with associated strategic infrastructure, including

contributions to local schools and provision of a new primary school on site in the second phase of development.

**Conclusions – Spatial Distribution of Housing Land**

There are several factors that require the indicative distribution of housing set out in Policy CS1 to be examined – updated need requirements (based on the standard method), development activity to date (based on the monitoring of completions to 2021/22), the projected housing supply during the current plan period (to 2028) and for an extended plan period to 2040 so that strategic policies cover a fifteen year period. These factors have been considered in the Housing Supply Assessment 2023 Report (which draws on the information in the Housing Land Position Statement 31 03 22) .

The Standard Method has had a significant impact on requirements for housing delivery in Rotherham. The Housing Supply Assessment report reflects and considers the implications of the resulting lower annual requirement. A sufficient amount of land is projected to be delivered to both 2028 and to 2040 relative to the number of homes needed – this is the case for all tiers in the settlement hierarchy. In the top tier the delivery emphasis is on the Rotherham Urban Area with some but relatively limited provision at Bassingthorpe Farm to 2028.

The indicative CS1 spatial distribution of new homes by settlement would not be achieved by 2028 with more development projected to take place lower down the settlement hierarchy than originally indicated in CS1. However, by 2040 a spatial distribution of housing development that is very close to the distribution indicated in CS1, would result for all tiers and settlements. This includes Bassingthorpe Farm and the new community at Waverley.

On this basis no change is proposed to the indicative distribution of housing development set out in Policy CS1 as this provides an appropriate long term strategy and indicative distribution.



## Section 10: Economic Recovery and Growth

### Background

68. Under the theme of ‘expanding economic opportunity’ the **Rotherham Council Plan 2022-25** sets out a vision for a “fair and prosperous economy that provides chances for everyone to get a good job, or start and grow a business, and plan confidently for the future”. Outcomes under this theme are focussed on a growing economy, delivering regeneration schemes in Rotherham town centre and in towns and villages, creating more local jobs, people having opportunities to learn, develop skills and fulfil their potential and strengthening digital infrastructure and skills.
69. **The South Yorkshire Strategic Economic Plan (SEP) 2021 – 2040** aims to transform the South Yorkshire economy, with an extra £7.6bn GVA, 33,000 extra people in higher level jobs, reduced income inequality and improved wages by over £1,500 for the lowest paid, and a net zero carbon economy. The **Sheffield City Region Renewal Action Plan**, July 2020, also sets out how South Yorkshire’s social and economic fightback from the coronavirus pandemic will kick start - helping people, employers, and places to recover.
70. The **regeneration of Rotherham Town Centre** remains a key focus for the Council. Easy access to the Meadowhall Centre in Sheffield and Parkgate Retail Park outside Rotherham Town Centre has contributed to a long decline in the retail sector. To seek to address this a Strategic Development Framework was produced in 2005, setting out a masterplan for Rotherham town centre with a broad 25-year vision. This was refreshed with the adoption in July 2016 of the **Rotherham Town Centre Supplementary Planning Document (SPD 1)** and a September **2017 Masterplan**. The Masterplan focuses on developing the economic vitality of Rotherham town centre, and aims to bring more life, activity and spending back into the town centre with an improved visitor experience. The Forge Island development is a joint scheme being delivered by Rotherham Council and Muse Developments. Work is now underway and once complete, it will include an 8-screen state-of-the-art boutique cinema, delivered by The Arc Cinema, alongside a 69-room Travelodge hotel. All commercial space has now been let with six restaurants confirmed, set within attractive public spaces. Phase one is now complete and Phase two is currently underway including Riverside Gardens, Rotherham Markets, new housing developments in the town centre and at Westgate and public realm improvements. Over £19.5 million from the **Levelling Up Fund** will continue the town centre regeneration programme, adding to investment from the Future High Street Fund and Towns Fund.
71. The Annual Monitoring Report (see section 14) reports that overall vacancy rates (based on units) across all defined town centres in the borough were 13.7% in 2023, 14.5 % in 2022, and 14.5 % in 2021. The nature and demand for uses within town centres is changing and evolving following the Covid-19 pandemic. Changes to town centre use classes have also allowed far greater flexibility to change uses within town centres without the need to obtain planning permission. Evidence relating to retail, leisure and other main town centre uses will need updating in the future, significant and ongoing structural change and redevelopment change would likely result in any town centre evidence update study being out of date quickly.
72. The **Advanced Manufacturing Innovation District (AMID)** extends between Sheffield and Rotherham. It includes four ‘hubs or campuses where there is a critical mass of world class innovation facilities and clusters of innovation-driven, advanced manufacturing and health research businesses. It represents one of the region’s key opportunities to deliver transformational economic development, stimulating the



economy of South Yorkshire and beyond. One of the campuses is the Advanced Manufacturing Park (AMP) in Rotherham, a nationally important critical mass of advanced manufacturing and engineering firms and research and development facilities. The businesses established here have strong future growth potential supported by strong links to Sheffield’s universities, and opportunities for local and regional supply chain opportunities.

- 73. A successful Levelling Up Fund bid for £19,990,000 for the **Leisure Economy and Skills** aims to build a new leisure industry for Rotherham that responds to the challenges of economic recovery and health and well-being. This initiative includes funding for improved stables at Wentworth Woodhouse, a new café at Thrybergh Country Park, new exhibitions at Magna and a new Visitor Centre at Rother Valley Country Park.
- 74. Following announcements in the March 2023 Budget a further £20m **Levelling Up Fund investment will take place in Dinnington and Wath**. The Dinnington scheme involves clearing empty shops, improving the outdoor market, and creating a new public square to enhance the town’s retail and food offer. The library in Wath will be demolished and replaced with a mixed-use building including a library, exhibition space, sensory provision, cafe, and commercial units.

**Assessment**

- 75. Core Strategy Policy CS 9, Transforming Rotherham’s Economy, aims to support Rotherham’s economic performance and transformation including the Advanced Manufacturing cluster at Waverley. Policy CS9 sets a policy framework to provide additional land for business and industrial development and for office floorspace – this is addressed in the following section 11 of this review.

**Conclusions – Economic Recovery and Growth**

There are no changes in circumstances which require an update to the majority of policy CS 9.

The core strategy policy approach continues to align with the priorities of South Yorkshire and Rotherham economic plans, strategies, and initiatives, including the continued regeneration and funding focus on Rotherham and other town centres and the development of the Advanced Manufacturing Innovation District (AMID).

The level of vacancy rates in town centres and the regeneration and levelling up driven restructuring and redevelopment activity that is underway in town centres does not support a need to further examine the need for, and provision of, main town centre uses at this current time.

## Section 11: Scale and Location of Employment Land

### Background

76. Core Strategy Policy CS9 seeks to provide 230 hectares of land for business and industrial development and 5 hectares of land for office floorspace. This would meet broad requirements for 12 - 15,000 additional jobs over the plan period of 2013 to 2028. Core Strategy Policy CS 1, Delivering Rotherham's Spatial Strategy, sets out how growth will be distributed throughout Rotherham's settlements, setting out 'where' and 'how much' new development should take place. Indicative percentages and figures were set out in Policy CS1 recognising that the precise amount of development to be delivered would be determined through the Sites and Policies document, which was subsequently adopted in 2018. The process of determining site allocations considered more detailed information on site availability, deliverability, constraints, and existing capacity. Policy CS1 sets out how much employment land each settlement (or settlement grouping) should accommodate as a percentage of the overall requirements.
77. An indicative overall provision of 230 hectares of employment land was included in the Core Strategy. Site allocations were made for 263.89 hectares in the Sites and Policies document and there were 10.2 hectares of completions 2013-2016 (see page 24 of Sites and Policies Adopted June 2018).

### Assessment

78. Table 1 below assesses and summarises the employment land position and distribution across settlements in the Borough. It details the indicative provision set out in Core Strategy Policy CS1, the area identified for development (through the sites and policies document), land developed to date and the amount of employment land remaining.

<b>TABLE 1: EMPLOYMENT LAND ASSESSMENT</b>	<b>Policy CS1 Indicative Employment Land Provision Sept 2014</b>	<b>Area for development (2016) in ha</b>	<b>Developed (ha) Jan 2022 &amp; Jan 2023 updates</b>	<b>January 2023 total employment land remaining (ha) including commitments</b>
<b>Settlement/Location</b>				
<b>Urban Areas</b>				
Rotherham Urban Area	71.00	65.16	13.05	52.11
<b>Principal Settlements for Growth</b>				
Dinnington, Anston & Laughton Common	38.00	28.15	16.15	12.00
Wath-upon-Deerne, Brampton & West Melton	16.00	12.07	3.41	10.16*
Bramley, Wickersley and Ravenfield Common	16.00	0	0	0
<b>Principal Settlements</b>				
Waverley	42.00	40.54	14.96	25.58
Maltby and Hellaby	5.00	54.23	11.10	43.13
Aston, Aughton & Swallownest	19.00	11.04	6.18	4.86
Swinton and Kilnhurst	0	1.54	0	1.54
Kiveton Park and Wales	9	32.34	0	32.34
Catcliffe, Orgreave, Treeton	12.00	12.4	5.85	6.55
Thurcroft	7.00	6.17	0	6.17

\*Figure reflects site E18 expanding after 2016 to incorporate adjoining car park.

79. In terms of the **overall quantum of employment land**, more provision was made in the Sites and Policies document than was indicated in the Core Strategy. 68 hectares of

land has been developed and 194 hectares of employment land remains at the main settlements/areas identified for growth and development in Policy CS1 of the Core Strategy. This remains a strong supply position.

80. The **Sheffield and Rotherham Joint Employment Land Review** in 2015 assessed employment land requirements to 2031 (slightly beyond the adopted Core Strategy plan period to 2028). The study concluded that the need for 235 ha identified within Rotherham's adopted Core Strategy is broadly in alignment with the top end of the range of requirements modelled and aligns closely with the level of demand identified on the basis of past take-up.
81. In 2019 **Sheffield City Region** commissioned a **Strategic Employment Land Appraisal**. This provided a high-level appraisal of strategic employment land supply designed to assist in helping to shape SCR's collaborative work with local districts, as well as inform the decisions of individual local planning authorities. The Appraisal concluded that there is an oversupply of employment land in Rotherham of around 30ha (to 2031). Manufacturing remains the largest sector in terms of employment in Rotherham, Waverley AMP and Sheffield Business Park were identified as the two key sites which provide greatest prospects for higher value jobs in Rotherham, as well as the potential of Templeborough in the Lower Don Valley Corridor and the Dinnington Regeneration Area and Wath/Manvers Regeneration Area in the Dearne Valley.
82. In terms of the **spatial distribution of employment land** by the settlements/groupings identified in Policy CS1 this largely follows the core strategy indicative distribution, notable differences are evident for the following settlements, with increased provision being made through site allocations:
  - Maltby and Hellaby – the Core Strategy recognised in 2014 that “to the east of Maltby the colliery has recently closed” and that “the opportunity to consider whether the site could contribute towards meeting some of the growth requirements in Maltby” would be explored through the Sites and Policies document. Land was subsequently allocated at the colliery as a Special Policy Area.
  - Kiveton Park and Wales – a larger scale of growth than envisaged is allocated, including land North of School Road, Waleswood. However due to safeguarding requirements for HS2 it was anticipated that employment development would be limited to land west of the HS2 line.
83. Development has taken place in most but not all settlements. There are some where no development has taken place on the employment land site allocations – at Swinton and Kilnhurst, Kiveton Park and Wales, and Thurcroft.

### **Conclusions - Scale and Location of Employment Land**

The overall remaining level of employment land provision in Policies CS9 and CS1 does not point to a need to change or update the Core Strategy. The employment land supply picture does not point to a need for additional land. The implications of extending the plan period to 2025-2040 should be considered and the interlinkages with the need for housing over this period.

## Section 12: Infrastructure Requirements & Delivery

### Background

84. As set out in Section 2, the 2021 **NPPF** sets out that all plans should promote a sustainable pattern of development and amongst other considerations this should ‘**align growth and infrastructure.**’
85. **Core Strategy Policy CS 32**, Infrastructure Delivery and Developer Contributions, sets out a policy approach for providing and funding necessary supporting ‘infrastructure’ to support sustainable communities. The policy aims to ensure that relevant infrastructure to accommodate development is provided in a timely and coordinated way to support the development process. It also sets out a number of principles related to negotiation with developers regarding developer contributions.
86. The **Rotherham Infrastructure Delivery Study 2012** provided a detailed assessment of infrastructure capacity and requirements to meet the needs of the planned growth. **Appendix A: Infrastructure Delivery Schedule** in the Core Strategy summarises the key findings of the previous Infrastructure Delivery Study and sets out detailed schedules relating to infrastructure requirements, costs, and project-related funding. 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.
87. The Council has prepared up to date Supplementary Planning Documents (SPDs) relating to Developer Contributions, Development Viability and Affordable Housing establishing how the Council will approach viability and developer contributions having regard to recent evidence and research.
88. The Levelling Up and Regeneration Bill seeks to replace the current system of developer contributions with a mandatory, more streamlined, and locally determined **Infrastructure Levy**. The Government undertook a technical consultation on an Infrastructure Levy between March and June 2023. This would reform the existing system of developer contributions in England - Section 106 planning obligations and the Community Infrastructure Levy. The consultation will inform the design of the Levy and the regulations that will set out its operation in detail, which will be subject to further consultation. Local authorities will be required to prepare Infrastructure Delivery Strategies to set out a strategy for delivering local infrastructure and spending Levy proceeds.
89. In terms of infrastructure related projects, **Rotherham’s Cycling Strategy**, January 2022, sets out plans for a high-quality cycle network and infrastructure and identifies priorities for investment. A scheme is being proposed for a new **Rotherham Integrated Mainline and Tram Train Station** which will significantly improve local, regional, and national rail connectivity for local people and businesses, offering access to employment and business growth opportunities, and contributing significantly to the economic regeneration of the town. Regeneration opportunities around a station site could potentially introduce different land uses to the area.

### Assessment

90. Since the Infrastructure Delivery Study was undertaken in 2012 infrastructure provision has taken place and further work has been undertaken to update infrastructure requirements. An infrastructure update was provided in the Community Infrastructure Levy Study (CIL) Final Report (2013) prepared to support development of the CIL in

Rotherham. More recently the Council has prepared a **new Infrastructure Delivery Study in 2021** to identify and cost the infrastructure required to support growth over the revised plan period to 2040.

91. The SPD documents (see paragraph 87 above) emphasise that negotiation on developer contributions will be in exceptional circumstances, and that through viability review mechanisms there is an expectation that any uplift in a scheme's net value following a viability review will be shared with the Council in the form of improved developer contributions. Changes also clarify that developers shall fund any independent viability appraisal and valuation of costs, and also any third party costs for initial and subsequent review of this evidence. National Planning Practice Guidance states that "*The price paid for land is not a relevant justification for failing to accord with relevant policies in the plan*" (Viability and Plan Making, PPG Paragraph: 002 Reference ID: 10-002-20190509). The 'premium' component of a benchmark land value should "*provide a reasonable incentive for a landowner to bring forward land for development while allowing a sufficient contribution to fully comply with policy requirements*" (PPG Paragraph: 016 Reference ID: 10-016-20190509).

### **Conclusions – Rotherham's Infrastructure Requirements & Delivery**

Appendix A of the Core Strategy, the Infrastructure Delivery Schedule, should be updated to reflect the findings of the 2021 Infrastructure Delivery Study.

This update will ensure that growth aligns with infrastructure (recognising that an infrastructure schedule should remain a 'live document' to reflect ongoing infrastructure changes and requirements). This approach will need to be further reviewed in the light of emerging proposals for Infrastructure Delivery Strategies, associated with the Infrastructure Levy.

Policy CS32 should be updated to make appropriate cross references to the Developer Contributions, Development Viability and Affordable Housing Supplementary Planning Documents and to reflect the approaches and requirements arising from them. The update should reflect that negotiation on developer contributions will be in exceptional circumstances, and that through viability review mechanisms there is an expectation that any uplift in a scheme's net value following a viability review will be shared with the Council in the form of improved developer contributions. Changes should also clarify that developers shall fund any independent viability appraisal and valuation of costs, and also any third party costs for initial and subsequent review of this evidence.

This policy approach will need to be further reviewed in the light of emerging proposals for the introduction of an Infrastructure Levy.



## Section 13: Census Results

### Background

92. 2021 Census results provide insight into the **population and household characteristics** of Rotherham. Data was first released by the ONS in June 2022 and comparison can be made to the previous 2011 Census results. The Census population of Rotherham in 2021 is estimated at 265,800, an increase of 8,200 (+3.2%) compared with the 2011 Census. This compares to population growth in England and Wales of 6.3%, in England (only) of 6.6% and in Yorkshire & The Humber of 3.7%.
93. 2021 **population projections** were also published by ONS in March 2020. For Rotherham the 2020 based projection gave a 2021 population of 268,485 rising to a projected 278,360 in 2031. The 2021 Census population of 265,800 shows that the 2020 based projection was 2,685 too high. This suggests that the 2020 based population projections for Rotherham may also overstate likely future population levels.

### Assessment

94. Some of the key population and household results from the 2021 Census are set out in table 2 below. The fall in the pre-school (0-4) population in the 2021 Census contrasts with the increased numbers in older age groups and indicates that primary school rolls are set to be impacted by lower pupil numbers.

<b>TABLE 2: ROTHERHAM 2021 CENSUS RESULTS</b>	<b>2021 Data</b>	<b>Change in % level from 2011</b>
Estimated population	265,800	+3.2%
Number of children aged 0-4	14,600	-7.3%
Population aged under 15	47,100	+2.4%
Population aged over 60	68,600	+11.5%
Households	113,900	+5.2%
Households that rent their accommodation	40,580 (35.7%)	+2.9%
Households that own their accommodation	72,496 (63.6%)	-1.6%
Households that lived rent free	383 (0.3%)	-1.4%

95. In terms of **travel to work**, a car or van remained the dominant mode of transport for usual residents aged 16 years and over in employment (59.8% travelling by car, and 5.8% as passengers in, a car or van). This compares to lower shares for people travelling by foot (5.6%), bus/minibus/ coach (4.2%), bicycle (0.8%) and train (0.4%).
96. 73,300 people travelled to a workplace or depot (62.1% of usual residents aged 16 years and over in employment). An additional 24,750 people worked mainly at or from home (21.0%). 40.6% of people travelled short distances to work - less than 10 kilometres. Nearly a quarter of households (23%) had no car or van, the number of households (37.1%) with more than one car or van increased from 2011 (31.7%). The number with one car or van (39.9% in 2021) fell from 2011 (41.7%).
97. 117,801 (57.4%) usual residents aged 16 years or over were recorded as **economically active** and in employment in 2021 – most were employees (101,225). 90,917 usual Rotherham residents aged 16 years and over were economically inactive in 2021 (42.2%). The broad industries that employed the largest numbers of people (usual residents aged 16 years and over in employment) in Rotherham at the time of Census 2021 were wholesale, retail and motor trade (17%), human health and social

work activities (15.5%), construction (11%), manufacturing (10.8%) and education (9.5%)

98. **The Joint Strategic Needs Assessment, June 2022**, also profiles the current and future health needs of Rotherham people (includes emerging data, or case studies, on the impact of the Covid-19 pandemic in Rotherham within the context of health and the wider determinants of health).

### **Conclusions – Census Results for Rotherham**

The 2021 Census results and the 2022 Joint Strategic Needs Assessment do not identify a need to update the Core Strategy policies.

The results support the existing policy approaches and requirements set out in the Core Strategy including the emphasis on focusing development on the Rotherham urban area and existing settlements (CS1); accessible places and managing demand for travel (CS 14); town centre transformation (CS 13); transforming Rotherham's economy (CS 9); improving skills and employment opportunities (CS 10); and community health and safety (CS 27).



## Section 14: Annual Monitoring Results

### Background

99. The Council publishes an **Annual Monitoring Report (AMR)** which assesses performance of Core Strategy policies using a range of indicators. The latest AMR was issued in December 2022 and covers the 2021/22 financial year.

### Assessment

100. Performance against the indicators is set out in the AMR and summarised in table 3 below, based on the AMR's grouping of monitoring indicators under themes.
- 101.

<b>Table 3: Monitoring Indicators Performance</b>	<b>Improving / On Target</b>	<b>No Change / No Update</b>	<b>Declining / Not on Target</b>
<b>Indicator themes</b>			
Delivering development in sustainable locations	3	4	1
Creating Mixed and Attractive Places to Live	3	2	1
Supporting a Dynamic Economy	3	4	4
Movement and Accessibility	4	2	2
Managing the Natural and Historic Environment	5	8	
Creating Safe and Sustainable Communities	4	4	

102. Further information on the above indicators is set out in the AMR. On overall balance there are more indicators that are improving/on target than are declining/not on target. The Economy theme is the main group of policies where targets are not being achieved. Declining performance relates to retail unit vacancy rates (see paragraph 71), industrial and commercial property vacancy rates, employment rates and minimum qualification levels. For the natural and historic environment no data or update is available for 5 of the 8 no change/no update indicators.

### Conclusions - Annual Monitoring Results for Rotherham

The AMR results do not identify a need for updates to Core Strategy policies.

The key performance concerns relate to the indicators related to 'Supporting a Dynamic Economy' – the indicators reflect economic events over recent years including the emphasis on post-Covid and high street recovery. The results reinforce the importance of policies CS9 to CS13.

## Section 15: Duty to Co-operate Findings

### Background

103. The Inspectors examining both the Core Strategy and the Sites and Policies Document 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.
104. The 2019 Core Strategy five year review documents identified that four local authorities had 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.
105. Ongoing discussions with other authorities on Statements of Common Ground were identified in 2019 with:
- Doncaster Metropolitan Borough Council (covering a range of issues).
  - Nottinghamshire County Council (focused on minerals matters).
  - 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).
106. **Since 2019 discussions and activities** have focused on:
- A **Sheffield City Region** (SCR) Statement of Common Ground - Rotherham agreed to be a signatory in December 2019, revised 2023 version produced which the constituent LPAs are in the process of signing.
  - **Mineral and Waste Strategic Movements** DTC letters - no strategic issues were identified with the South London Waste Plan (Nov 2019); East Riding of Yorkshire and Kingston upon Hull (Mar 2021); Hampshire Minerals and Waste Plan Partial Update (Aug 2021); Cheshire East Mineral & Waste Plan (Dec 2022); and Nottinghamshire and Nottingham Waste Local Plan (Feb 2023).
  - **Signed Statements of Common Ground** - agreed with Cambridgeshire & Peterborough on waste movements (May 2019); Nottinghamshire County Council on a minerals local plan (Nov 2019); Doncaster on a local plan (Mar 2020); Wakefield on a local plan/waste management (Jun 2021); and with Bassetlaw on a local plan and A1 property market area logistics assessment (Nov 2022).
  - **Ongoing DTC meetings/discussions/submitted comments:** with Bassetlaw and Sheffield on their respective draft local plans (2021/22); Barnsley on the outcome of their local plan review (Oct 2022); Bassetlaw with representations made to the local plan examination re Apleyhead Junction site allocation (Oct 2022); and with Sheffield on the Publication Local Plan reiterating previous responses on housing land and expressing concerns about the level of the housing requirement and the non-release of Green Belt land (Jan 2023).

## Assessment

107. There have been repeated requests from Sheffield for Rotherham to take some of their housing need, which have been declined. The representations on the Apleyhead Junction strategic employment site in Bassetlaw relate to traffic related impacts of the proposed allocation/development.
108. **Core Strategy Policy CS 34** addresses 'Housing Delivery and Ongoing Co-operation.' Part A of the Policy has been satisfied through the production of joint SHMA evidence with Sheffield City Council. No additional housing provision was identified as being required as a result of this evidence. Part A was a response to the absence of a SHMA which covered the full housing market area and established a need to undertake an immediate review of the Core Strategy should the SHMA demonstrate a need for additional housing provision.
109. With regard to part B of Policy CS 34, the housing delivery test has subsequently been introduced. This NPPF requirement measures net additional dwellings provided against the homes required, using national statistics and local authority data. Part B set out how the Council will monitor housing supply against the Core Strategy requirement and identifies actions which may be taken where development is slower than anticipated or that site development is not commencing when expected.

### Conclusions - Duty to Co-operate Findings

No updates to Core Strategy policies are required because of recent Duty to Cooperate Activity.

Policy CS34 should be deleted given the production of the SHMA by the Council and Sheffield City Council and the national introduction of the Housing Delivery Test. Part A of the Policy is out of date and Part B is no longer necessary.

## Section 16: Appeals Performance

### Background

110. Between adoption of the Core Strategy in 2014 and 3 March 2023, the Council received 257 planning appeal decisions. Previous analysis for the period up to 1 February 2019 identified that 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). Recent analysis for the period between 2 February 2019 to 3 March 2023, indicates that the Council received 94 planning appeal decisions. 74.8% of these decisions to refuse permission were upheld by Inspectors at appeal, and 25.2% were allowed (or allowed in part).
111. For both periods further detailed analysis was undertaken of those appeals where specific Core Strategy policies are referred to in the reasons for refusal. No major areas of concern or indications that Core Strategy policies require an update were established from this analysis.
112. The earlier analysis identified 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.
113. Core Strategy policies that have been referred in the reasons for refusal since February 2019 are: CS4, CS12, CS14, CS19, CS20, CS22, CS23, CS27 and CS28. Among 23 appeals that were allowed 19 relate to householder development. The Council has refused 202 householder applications within this period and 50 appeals have been received. Policies CS27 and CS28 have been referenced in the reasons of refusal, however, the Inspector has mostly made reference to the policies in the Sites and Policies Document and the Supplementary Planning Document 4 'Householder Design Guide'. There were appeals referring to Policy SP55 where the Inspector has also made cross reference to the National Design Guide and South Yorkshire Residential Design Guide when considering design matters.

### Assessment

114. In terms of providing greater clarity on the achievement of a 'net gain' in green infrastructure this could be delivered through other means, such as additional guidance, rather than requiring an update of the Core Strategy policy. It is acknowledged that some amendments to the Householder Design Guide (SPD 4) could be considered, however it would not require an update to the CS or S&P policies. References to the National and South Yorkshire Residential design guides could be considered and reflected in the production of a borough-wide design guide/code and as part of the Sites & Policies Document review or an SPD in the future.

### Conclusions - Appeals Performance in Rotherham

The analysis of planning appeal decisions over a nine year period has not identified any significant concerns about Core Strategy policies and that warrant any updates to policies.

## SECTION 17: CONCLUSIONS

115. This Plan Review identifies that one or more policies of the Rotherham Local Plan Core Strategy do need updating and an updated Local Development Scheme should set out the timetable for this revision. Table 4 below sets out a schedule of the Core Strategy policies recommended to be updated based on the previous sections and also the findings from appendices A & B.

<b>CORE STRATEGY POLICIES THAT REQUIRE UPDATING</b>	
<b>Policy</b>	<b>Does the Policy require updating?</b>
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	Yes
Policy CS 17 Passenger Rail Connections	Yes
Policy CS 18 Freight	No
Policy CS 19 Green Infrastructure	No
Policy CS 20 Biodiversity and Geodiversity	No
Policy CS 21 Landscape	Yes
Policy CS 22 Green Space	No
Policy CS 23 Valuing the Historic Environment	No

<b>CORE STRATEGY POLICIES THAT REQUIRE UPDATING</b>	
<b>Policy</b>	<b>Does the Policy require updating?</b>
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	Yes
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	Yes
Policy CS 33 Presumption in Favour of Sustainable Development	Yes
Policy CS 34 Housing delivery and ongoing co-operation	Yes

## APPENDIX A

### Overview & assessment of national planning policy requirements

NPPF CHAPTER	SUMMARY OF ASSESSMENT
<b>2. Achieving sustainable development</b>	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 requirements based on the standard housing need methodology. Consideration also needs to be given to the updated presumption in favour of sustainable development, the local, national, and international imperative to address climate change and need to align with growth and infrastructure.
<b>3. Plan making</b>	The Core Strategy remains broadly in line with the requirements of this chapter. the priorities and objectives of the Core Strategy remain appropriate. The Plan Review highlights a number of updated evidence bases that need to be taken into account, particularly for an extended plan period that would be required to meet requirements of the 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.
<b>4. Decision-making</b>	Not directly relevant to the Core Strategy.
<b>5. Delivering a sufficient supply of homes</b>	Whilst the Core Strategy broadly meets most 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. An update to the Core Strategy is therefore required. The findings of the SHMA and evidence base work on Supplementary Planning Documents needs to be taken into account in view of the likely extension of the plan period as part of any Core Strategy update. Up to date evidence regarding Gypsy and traveller housing needs has been provided in the most recent study: Rotherham Gypsy and Traveller, Travelling Showpeople and Boat Dwellers Accommodation Assessment (May 2021). The Core Strategy should consider the need and scope to provide housing requirements for designated Neighbourhood Plan areas.
<b>6. Building a strong, competitive economy</b>	Existing Core Strategy policies meet the requirements set out in this chapter, there is a strong supply position. Employment land need requirements will need to be considered in the context of an extended plan period of 2025 to 2040 and to confirm the alignment of housing and employment land requirements over an extended plan period.
<b>7. Ensuring the vitality of town centres</b>	The Core Strategy meets the requirements of the NPPF, including establishing a local threshold for impact assessments. There is no evidence that the hierarchy of centres or strategic policies in the Core Strategy require updating in this respect. 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.
<b>8. Promoting healthy and safe communities</b>	The Core Strategy meets the requirements set out in this chapter.
<b>9. Promoting sustainable transport</b>	The Core Strategy meets the requirements set out in this chapter.
<b>10. Supporting high quality communications</b>	Whilst the Core Strategy broadly meets most 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



NPPF CHAPTER	SUMMARY OF ASSESSMENT
	any review of these policies would need to consider whether an update is required to address delivery of digital infrastructure.
<b>11. Making effective use of land</b>	The Core Strategy meets the requirements set out in this chapter.
<b>12. Achieving well-designed places</b>	The Core Strategy meets the policy requirements set out in this chapter. Consideration should be given to the use of the Government's technical housing standards within Rotherham. There are more specific references to design guides and codes in this chapter which need to be addressed for Rotherham.
<b>13. Protecting Green Belt land</b>	The Core Strategy meets the requirements set out in this chapter.
<b>14. Meeting the challenge of climate change, flooding, and coastal change</b>	The Core Strategy broadly meets the requirements set out in this chapter. 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. 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 and there is an opportunity to update policy regarding sustainable drainage systems.
<b>15. Conserving and enhancing the natural environment</b>	The Core Strategy meets the requirements set out in this chapter. Consideration should be given to explaining the requirements of the Environment Act and for Biodiversity Net Gain as important context.
<b>16. Conserving and enhancing the historic environment</b>	The Core Strategy meets the requirements set out in this chapter.
<b>17. Facilitating the sustainable use of minerals</b>	The Core Strategy meets the requirements set out in this chapter.

## APPENDIX B

### Assessment of Core Strategy against national planning policy

POLICY	SUMMARY ASSESSMENT
<b>Policy CS 1 Delivering Rotherham's Spatial Strategy</b>	The overall spatial strategy, the hierarchy of settlements and the indicative distribution of development and parts 2 to 4 of the policy (dealing with the strategic allocation, the broad location for growth and the new community at Waverley) remain appropriate for an extended plan period to 2040. The implications of changes to the housing requirement, following the introduction of the standard method for calculating housing need, should be addressed and an associated extension of the plan period to meet NPPF requirements. The spatial strategy's overall emphasis on addressing and prioritising climate change should be further considered.
<b>Policy CS 2 Delivering Development on Major Sites</b>	An update of this policy is not required. The 2019 Review identified that there was potential to strengthen the policy with regard to the circumstances when master planning will be required for sites (taking account of the now adopted Sites and Policies document). This is not considered a necessary change.
<b>Policy CS 3 Location of New Development</b>	The policy remains appropriate, addressing key issues which remain compliant with national planning policy.
<b>Policy CS 4 Green Belt</b>	The policy remains compliant with the NPPF, and a fundamental update of this policy is not required.
<b>Policy CS 5 Safeguarded Land</b>	The policy remains compliant with national policy and a fundamental update of this policy is not required. Safeguarded Land is identified in the adopted Sites and Policies document.
<b>Policy CS 6 Meeting the Housing Requirement</b>	An update will be required to reflect the implications of changes to the housing requirement following the introduction of the standard method for calculating housing need and an extended plan period.
<b>Policy CS 7 Housing Mix and Affordability</b>	The latest evidence regarding affordable housing and viability in Rotherham and national policy regarding affordable housing, along with any implications arising from the updated SHMA, should be reflected in an update of the policy. National technical housing space standards could now be used in the Local Plan.
<b>Policy CS 8 Gypsy and Traveller Accommodation</b>	Up to date evidence on Gypsy and Travellers, Travelling Showpeople and boat dwellers accommodation needs has been produced, and should be reflected in any update.
<b>Policy CS 9 Transforming Rotherham's Economy</b>	The policy remains compliant with national policy, however given the relationship between housing growth and economic development, an update may be required to address an extended plan period and to consider the implications arising from any update to the borough's housing requirement.
<b>Policy CS 10 Improving Skills and Employment Opportunities</b>	The policy remains compliant with national policy and there are no changes in circumstance which indicate the need for an update.
<b>Policy CS 11 Tourism and the Visitor Economy</b>	The policy remains compliant with national policy and there are no changes in circumstance which indicate the need for an update.
<b>Policy CS 12 Managing Change in Rotherham's Retail and Service Centres</b>	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. 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

POLICY	SUMMARY ASSESSMENT
	Strategy policy in this respect, and up to date guidance regarding implementing CS12 will be set out in a Supplementary Planning Document.
<b>Policy CS 13 Transforming Rotherham Town Centre</b>	The policy remains compliant with national policy and there are no changes in circumstance which indicate the need for an update. There have been changes to Use Classes. These do not change the intent of the Policy; these changes could be explained in a Supplementary Planning Document.
<b>Policy CS 14 Accessible Places and Managing Demand for Travel</b>	The policy remains compliant with national policy and there are no changes in circumstance which indicate the need for an update.
<b>Policy CS 15 Key Routes and the Strategic Road Network</b>	The policy remains compliant with national policy and there are no changes in circumstance which indicate the need for an update.
<b>Policy CS 16 New Roads</b>	The status of the proposed new roads which were identified as likely to be delivered in the plan period should be examined and reflected in any update.
<b>Policy CS 17 Passenger Rail Connections</b>	The policy remains compliant with national policy The status of proposed new local rail projects can be clarified including pedestrian and cycle station access improvements, new station proposals and any associated park and ride facilities and possible Tram Train extension routes.
<b>Policy CS 18 Freight</b>	The policy remains compliant with national policy and there are no changes in circumstance which indicate the need for an update.
<b>Policy CS 19 Green Infrastructure</b>	The policy remains compliant with national policy and there are no changes in circumstance which indicate the need for an update.
<b>Policy CS 20 Biodiversity and Geodiversity</b>	The policy remains compliant with national policy, it reflects the emphasis on improving biodiversity and achieving net gains. An SPD has been produced which addresses the net gain target.
<b>Policy CS 21 Landscape</b>	The policy remains compliant with national policy, the deletion of the Area of High Landscape Value designation in the Sites and Policies document should be reflected.
<b>Policy CS 22 Green Space</b>	The policy remains compliant with national policy and there are no changes in circumstance which indicate the need for an update.
<b>Policy CS 23 Valuing the Historic Environment</b>	The policy remains compliant with national policy and there are no changes in circumstance which indicate the need for an update.
<b>Policy CS 24 Conserving and Enhancing the Water Environment</b>	The policy requires updating to be consistent with the hierarchy of drainage options set out in Planning Practice Guidance.
<b>Policy CS 25 Dealing with Flood Risk</b>	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, reflecting the national Planning Practice Guidance issued in 2022.
<b>Policy CS 26 Minerals</b>	The policy remains compliant with national policy; however, the policy could be updated to support the net zero climate change approach. The policy approach towards fossil fuel extraction and exploitation could be considered and appropriate aftercare practices.
<b>Policy CS 27 Community Health and Safety</b>	The policy remains compliant with national policy. There is an opportunity through an update to set out the requirements for Equal and Healthy Communities reflecting Policy SP55, the associated SPD and the requirements for Building for a Healthy Life.
<b>Policy CS 28 Sustainable Design</b>	The policy remains compliant with national policy and there are no changes in circumstance which indicate the need for an update. References should be considered to the NPPF focus on achieving well-designed places and the role of design guides and codes.

POLICY	SUMMARY ASSESSMENT
<b>Policy CS 29 Community and Social Facilities</b>	The policy remains compliant with national policy and there are no changes in circumstance which indicate the need for an update.
<b>Policy CS 30 Low Carbon &amp; Renewable Energy Generation</b>	The policy remains compliant with national policy; however, there are opportunities to consider how the policy could be updated to support the 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.
<b>Policy CS 31 Mixed Use Areas</b>	The policy remains compliant with national policy and there are no changes in circumstance which indicate the need for an update.
<b>Policy CS 32 Infrastructure Delivery and Developer Contributions</b>	There are no changes in circumstance which indicate the need for an update to the policy. Government consultation on the introduction of an Infrastructure Levy has been undertaken. An updated Infrastructure Delivery study has been produced and the schedule at Appendix A should be updated on this basis.
<b>Policy CS 33 Presumption in Favour of Sustainable Development</b>	This policy duplicates the presumption in favour of sustainable development set out in the NPPF and is therefore not required.
<b>Policy CS 34 Housing delivery and ongoing co-operation</b>	This policy is no longer required. The national Housing Delivery Test has been introduced.