

## PAS LOCAL PLAN ROUTE MAPPER PART 2: LOCAL PLAN FORM & CONTENT CHECKLIST

The following table sets out a checklist of the key requirements for the content and form of local plans as set out in the National Planning Policy Framework (NPPF) February 2019. The table will help the Council to review relevant sections of the NPPF and consider any implications for policies in the Core Strategy. The table is part of a suite of documents that make up the 'Local Plan Route Mapper and Toolkit' produced by the Planning Advisory Service (PAS). A link to the PAS website is below:

[Local Plan Route Mapper & Toolkit - reviewing and updating local plan policies | Local Government Association](#)

Column C in the table records the results of the Council's assessment against the checklist for a Local Plan Review. The assessment can be used to inform the decision on whether or not current local plan policies remain compliant with the provisions of the NPPF and whether they need to be updated or replaced. It can:

- Consider whether the development plan for your area still meets current NPPF requirements.
- Identify which policy and document addresses the requirement in column C or identify why it is not relevant.

The Core Strategy was adopted under the 2012 NPPF and there have been a number of new or revised NPPF requirements since the adoption of the Plan that are set out in the 2019 NPPF. New plan-making requirements of the 2019 NPPF not contained within the previous 2012 version have been marked with an asterisk (\*) in column B where applicable.

In January 2021, the Ministry of Housing, Communities and Local Government (MHCLG) undertook a consultation seeking views on draft revisions to the NPPF. A draft National Model Design Code was also published for consultation as a sister document. The draft has been published to propose changes to the content of the NPPF. This primarily covers design related matters as Central Government implements the recommendations of the [Building Better Building Beautiful Commission "Living with Beauty" report](#). This is linked with a much greater focus on the importance of good quality design in the planning process. The changes also cover environmental related changes related to flood risk and climate change plus detailing with updates to out-of-date text. The Council has taken this opportunity to also assess the Core Strategy policies against the proposed amendments in the 2021 consultation NPPF. For each affected policy, the proposed amended NPPF text is set out in column A and the Council's associated comments are set out in Column C [in square brackets].

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	<b>A. NPPF Requirement</b>	<b>B. NPPF Paragraph Reference</b>	<b>C. Record your assessment results</b>
	<i>General Requirements</i>		
1.	Include any relevant material that is set out in a government policy statement(s) for the area for example a national policy statement(s) for major infrastructure and written ministerial statements.	NPPF Para 5, 6	None referred to in the Core Strategy (CS). This will need to be considered as part of the Local Plan review process.
2.	Contribute to the achievement of sustainable development.  [Para 8 of the 2020 consultation version NPPF refers to “well-designed, beautiful and safe places” and removes reference to ‘built environment’. This is following the publication of the report ‘Living with Beauty’ in January 2020 by the ‘Building Better, Building Beautiful’ Commission].	NPPF Para 8, 9, 16	Strategic Objectives, plus policies CS.1, CS.2, CS.3, CS.4, CS.5, CS.6, CS.7, CS.15, CS.16, CS.17, CS.18, CS.19, CS.20, CS.21, CS.22, CS.23, CS.24, CS.25, CS.26, CS.27, all AS policies and site specific proposals are relevant. The purposes of achieving sustainable development have not altered since the 2012 version NPPF against which the CS was Examined. It is considered the CS is still in general conformity with the NPPF in this regard. The Local Plan review process will continue to build upon these overarching principles.  [At a strategic policy level, it is not considered these wording changes fundamentally alter the assessment of the social objective to achieving sustainable development. As such, it is considered the CS would remain in general conformity with the NPPF should this revised wording be introduced.]
3.	Apply the presumption in favour of sustainable development.  [Criteria a) of Para 11 of the 2020 consultation version NPPF has been amended to read: “ <u>all plans should promote a sustainable pattern of development that seeks to meet the development needs of their area; align growth and</u> ”	NPPF Para 11	Policies CS.1, CS.15, CS.16, CS.17, CS.21, CS.22 and CS.23 are relevant. The matter of presumption in favour of sustainable development has not altered since the 2012 version NPPF against which the CS was Examined. It is considered the CS is still in general conformity with the NPPF in this regard.  [Whilst the wording of this element of the policy is more prescriptive, it is suggesting flexibility is still key to meeting the

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	<p><u>infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects</u>  <del>plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change”].</del></p>		<p>development needs of the area in question beneath the overarching requirement of sustainable patterns of development, whilst taking into account the critical issues of infrastructure and climate change, which are the clear objectives and hurdles for future development. It is considered the CS policies listed above (plus other policies that relate specifically to environmental improvement) remain consistent with the revised NPPF wording. As such, it is considered the CS would remain in general conformity with the NPPF should this revised wording be introduced.]</p>
4.	<p>Provide a positive vision for the future; a framework for addressing housing needs and other economic, social and environmental priorities.</p>	<p>NPPF Para 15</p>	<p>CS Vision, Strategic Objectives, plus policies CS.1, CS.15, CS.16, CS.17, CS.18, CS.19, CS.21, CS.22, CS.23, Area Strategies AS.1 to AS.11, SUA.1 to SUA.4, ALC.1 to ALC.3, SOU,1 to SOU.3, Proposal GLH, Proposal LMA, REDD.1 and REDD.2 are relevant. This is another requirement that has not changed since the 2012 version NPPF against which the CS was examined. It is considered the policies set out a framework for addressing needs and priorities in the District and is therefore is still in general conformity with the NPPF in this regard. The LP review will consider new priorities for the area, based on the same overarching principles.</p>
5.	<p>Plans should be:                      Aspirational and deliverable                      Contain clear and unambiguous policies                      Accessible through the use of digital tools                      Serve a clear purpose avoiding duplication</p>	<p>NPPF Para 16</p>	<p>The CS was prepared against para’s 150 to 156 of the 2012 version NPPF, which are replicated by criterion a) to d) of para 16 of the 2019 NPPF. It is considered the CS adheres to the principles set out in the NPPF through clear, deliverable policies based on the objective of contributing to the achievement of sustainable development, that serve a clear purpose. As such, it is considered the CS remains in general conformity with the NPPF. The LP review will be able to consider the use of new</p>

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			technology to assist with and improve public involvement and policy presentation.
6.	<i>Plan Content</i>		
7.	<p>Include strategic policies to address priorities for the development and use of land. They should set out an overall strategy for the pattern, scale and quality of development.</p> <p>[Para 20 of the 2021 consultation version NPPF has been amended to read “Strategic policies should set out an overall strategy for the pattern, scale and <u>design</u> quality of <u>places</u> <del>development</del>...”. The remainder of the para (including the criteria listing the types of development relevant to the policy remain unchanged].</p>	NPPF Para 17, 20	<p>Policies CS.1, CS.9, CS.15, CS.16, CS.17, CS.18, CS.20, CS.21, CS.22, CS.23, CS.24 and Area Strategies AS.1 to AS.11 are relevant. These set out the priorities for the development and use of land and an overall strategy for the dispersal, scale and quality of development. It is considered that these policies, the Area Strategies and other policies in the CS that look to conserve and enhance the natural, built and historic environment ensure the CS remains in general conformity with the NPPF in this regard.</p> <p>[This change of emphasis links to the publication of the report ‘Living with Beauty’ in January 2021 by the ‘Building Better, Building Beautiful’ Commission. It is considered the CS policies set out above would still provide an appropriate strategy for the creation of ‘quality places’. As such, it is considered the CS would remain in general conformity with the NPPF should this revised wording be introduced.]</p>
8.	Outline which policies are ‘strategic’ policies	NPPF Para 21 *	All policies in the CS are considered strategic in nature.
9.	<p>Strategic policies should look ahead over a minimum 15-year period <u>from adoption</u>.</p> <p>[Para 22 of the 2021 consultation version NPPF has been amended to include the following additional sentence: “<u>Where larger-scale development such</u></p>	NPPF Para 22	<p>The CS was adopted in July 2016. The plan period is until 2031, which equates to a 15 year period from adoption, in accordance with NPPF para 22.</p> <p>[This will form part of the Local Plan Review for the South Warwickshire Plan, with a Plan period ending 2050].</p>

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	<u>as new settlements form part of the strategy for the area, policies should be set with a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery.”]</u>		
10.	Indicate broad locations for development on a key diagram, and land use designations and allocations on a policies map.	NPPF Para 23	Broad locations for development are indicated on the Key Diagram at p.17 of the CS. Land use designations and allocations are shown on the policies map and inset maps appended to the CS.
11.	Strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs (OAN) over the plan period.	NPPF Para 23 *	Policies CS.1, CS.15, CS.16, CS.17, CS.18, CS.21, CS.22, CS.23 and Area Strategy policies are relevant. These policies set out the strategy for bringing land forward at a sufficient rate, to address OAN over the Plan period, as required by the NPPF. It is acknowledged that the LP review will need to take account of the standard method in terms of housing provision for the revised Plan period. However, it is considered that the CS remains in general conformity with the NPPF in this regard.
12.	Include non-strategic policies to set out more detailed policies for specific areas.	NPPF Para 18, 28 *	The CS does not contain non-strategic policies. Non-strategic policies for the District are set out in numerous ‘made’ Neighbourhood Development Plans (NDPs) which cover their own specific areas or neighbourhoods. All NDPs in the District are based on Parish boundaries.
13.	Set out contributions expected from development, and demonstrate that expected contributions will not undermine the deliverability of the Plan.	NPPF Para 34, 57 *	Policies CS.2, CS.3, CS.4, CS.7, CS.18, CS.25, CS.26 and CS.27 are relevant. These policies set out the appropriate levels and types of affordable housing provision, infrastructure, developer contributions etc expected from development. It is considered that these policies and the contributions set out within them do not undermine the deliverability of the Plan and are in general conformity with the NPPF.

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	<i>Housing</i>		
14.	Be informed by a local housing need assessment, conducted using the standard method in national planning guidance as a starting point.	NPPF Para 60 *	Policy CS.16 plus Explanatory text, Figure 1 (Housing Trajectory Table) and Figure 2 (5 year Housing Land Supply calculation) are relevant. At the time the CS was Examined, housing numbers were assessed by calculating the Objectively Assessed Need (OAN) since the 'Standard Method' was yet to be introduced. As such, there is no reference to the 'Standard Method' in the CS. However, the housing figures in the CS were calculated by using the correct method at that time and based on the current Standard Method, still bear scrutiny. It is acknowledged that the LP review will be able to take account of the revised NPPF requirements. The Part 1 Review Assessment confirms that there has been no significant change in the housing requirement figure between OAN and LHN. Therefore, it is considered the CS remains in general conformity with the NPPF on this issue.
15.	Identify the size, type and tenure of housing needed for different groups.	NPPF Para 61	Policies CS.19 and CS.21 are relevant. These policies set out the size, type and tenure of housing needed for different groups in the community. Whilst it is considered these policies are in general conformity with the NPPF, it is acknowledged that these policies don't cover all groups listed at NPPF para 61. The main omission from the CS relates to referencing people wishing to commission or build their own homes. Since the CS was at an advanced stage before this Government initiative took place, it does not contain a policy on self-build. However, the District Council is currently preparing a Site Allocations Plan (SAP), which includes such a policy (Policy SAP.6). The SAP, once adopted, will form part of the Development Plan for the District.

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	<b>A. NPPF Requirement</b>	<b>B. NPPF Paragraph Reference</b>	<b>C. Record your assessment results</b>
16.	Where a need for affordable housing is identified, specify the type of affordable housing required.	NPPF Para 62	Policies CS.18 and CS.19 are relevant. The policies set out the circumstances in which affordable housing is required. They also confirm it should equate to on-site provision except in the circumstances listed in Policy CS.18 (relating to the scale of development). It is considered these policies remain in general conformity with the NPPF. However, in terms of type of affordable housing required, Policy CS.18C refers to the affordable housing definition. It is acknowledged that the tenures listed do not exactly match the definition set out in Annex 2 to the NPPF, due to amendments to the definition since the adoption of the CS. However, the policy 'hook' is still relevant and appropriate with the newer NPPF definitions falling within the scope of the 'intermediate' affordable housing definition set out in the CS.
17.	Expect at least 10% of homes to be available for affordable home ownership (where major development involving the provision of housing is proposed), unless this would exceed the level of affordable housing required in the area, or significantly prejudice the ability to meet the identified affordable housing needs of specific groups.  [Para 64 of the 2019 NPPF (para 65 of the 2021 consultation NPPF) has been amended to read "...planning policies and decisions should expect at least 10% of the <u>total number of</u> homes to be available for affordable home ownership."]	NPPF Para 64 *	Policy CS.18 is relevant. The policy indicates that for major development proposals, affordable housing provision will equate to 35% of the homes, unless credible site specific evidence of viability indicates otherwise. The CS requirement is clearly far in excess of the obligation set out in the NPPF and is in general conformity with the NPPF in this regard.  [It is not considered that the wording inserted into the policy would result in any conformity issues for SC policies on this subject matter. As such, it is considered the CS would remain in general conformity with the NPPF should this revised wording be introduced.]

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	<b>A. NPPF Requirement</b>	<b>B. NPPF Paragraph Reference</b>	<b>C. Record your assessment results</b>
18.	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.	NPPF Para 65 *	Policy CS.16 plus Figure 1 sets out the housing requirement and distribution strategy. Proposal GLH, Proposal LMA, SUA.1, SUA.3, ALC.1, ALC.2, SOU.1, SOU.2, SOU.3 and AS.11 (Large Brownfield Sites) set out the relevant allocations promoted through the CS. It is considered that these policies adhere to the requirements of the NPPF and are therefore in general conformity with the provisions of para 65.
19.	Identify a supply of specific, deliverable sites for years one to five of the plan period, and specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.	NPPF Para 67	Policy CS.16 and Figure 1 identifies the supply of sites and the quantum of development for the various periods within the life of the Plan. The trajectory (as set out at Fig.1) complies with the provisions of associated para 73 of the NPPF re: illustrating the expected rate of delivery. The Council is also able to confirm compliance with the requirement to identify an annual supply of specific deliverable sites sufficient to ensure a 5 year Housing Land Supply – a further requirement of para 73 of the NPPF. It is therefore considered the CS is in general conformity with the NPPF.
20.	Identify land to accommodate at least 10% of the housing requirement on sites no larger than one hectare; unless it can be demonstrated that there are strong reasons why the 10% target cannot be achieved.	NPPF Para 68 *	There is no specific policy in the CS to identify a minimum of 10% of the housing requirement on sites smaller than 1 Ha in size. There is no policy 'hook' in the CS to use area-wide Design Assessments or Local Development Orders to help bring forward small and medium size sites. However, Policy CS.15 does set out an effective policy mechanism for delivering windfall housing sites through small-scale schemes on unidentified but suitable sites within the physical confines of Stratford Town, Main Rural Centres and Local Service Villages. Monitoring confirms that the 10% target has been exceeded in respect of supply.

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21.	Support the development of entry level exception sites, suitable for first time buyers, unless the need for such homes is already being met within the authority's area.	NPPF Para 71	There is no specific policy wording in Policies CS.15 or CS.18 relating to support for entry level exception sites of no more than 1 Ha or 5% of the size of the existing settlement, although Policy CS.15 permits Local Needs Schemes, including 100% affordable housing schemes or rural exception sites. Entry level exception sites would fall under the scope of this policy.
22.	Include a trajectory illustrating the expected rate of housing delivery over the plan period, and requiring a buffer of 10% where the local planning authority wishes to demonstrate a five year supply of deliverable sites through an annual position statement or recently adopted plan.	NPPF Para 73	Figure 1 – Trajectory Table associated with Policy CS.16. The trajectory (as set out at Fig.1) complies with the provisions of associated para 73 of the NPPF re: illustrating the expected rate of delivery. This trajectory is updated annually as part of the publication of the AMR. The Council is also able to confirm compliance with the requirement to identify an annual supply of specific deliverable sites sufficient to ensure a 5 year Housing Land Supply – a requirement of para 73 of the NPPF. Given the significant boost in housing supply achieved, and the fact that the past 3 years have seen record levels of housing delivered, the Council considers it is appropriate to apply a 5% buffer in accordance with para 73. It is therefore considered the CS is in general conformity with the NPPF.
23.	Be responsive to local circumstances and support rural housing developments that reflect local needs.	NPPF Para 77	Policies CS.15, CS.16, CS.18, CS.19 and AS.10 are relevant. The CS supports housing developments that reflect local needs and supports rural exception sites that will provide affordable housing to meet identified local needs, including some market housing, should it be necessary to facilitate an appropriate development. It is considered that the CS policies are still in general conformity with the NPPF in this regard.
24.	Identify opportunities for villages to grow and thrive, especially where this will support local services.	NPPF Para 78	Policies CS.15, CS.16 (including reference to Neighbourhood Plans), CS.18, CS.19 and AS.10 are relevant. The CS supports sustainable development in rural areas to maintain the vitality

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			of rural communities. It is considered the CS is in general conformity with the NPPF in this regard.
25.	<p>Avoid the development of isolated homes in the countryside unless specific circumstances are consistent with those set out in the NPPF.</p> <p>[Para 79 of the 2019 NPPF (para 80 of the 2021 consultation NPPF) would be amended as follows: Criteria d) replace ‘residential <del>dwelling</del>’ with ‘residential <u>building</u>’; Criteria e) remove ‘innovative’ as a criteria for assessing exceptional design quality for isolated homes in the countryside.]</p>	NPPF Para 79	<p>Policies AS.10 and CS.9 are relevant. Specifically, Policy AS.10 criteria (b) to (j) inclusive refer to residential development in the countryside. Whilst the general principles of para 79 are encapsulated in Policy AS.10, there are differences in the language used to describe matters relating to rural worker dwellings, viable use of heritage assets and dwellings of ‘exceptional quality’. Additionally, the CS is silent on the issue of sub-dividing existing residential dwellings. Whilst it is acknowledged there are some differences between the CS and the NPPF, they are not so significant that they render the CS out of conformity with the NPPF. However, it is recognised there are differences in the language used to assess compliance. This will need to be considered through the LP review.</p> <p>[It is not considered either amendment would have any impact on the compatibility of CS policies with the NPPF. Indeed, the CS does not refer to ‘innovative’ design, but lists ‘exceptional’ design. As such, it is considered the CS would remain in general conformity with the NPPF should this revised wording be introduced.]</p>
	<i>Economy</i>		
26.	Create conditions in which businesses can invest, expand and adapt.	NPPF Para 80	CS Vision, Strategic Objectives, plus policies CS.1, CS.15, CS.22, CS.23, CS.24, Area Strategies AS.1 to AS.11, SUA.1, SUA.2, SUA.4, Proposal GLH, Proposal LMA, REDD.1 and REDD.2 are relevant. The requirements of this specific paragraph have not changed since the 2012 version NPPF

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			against which the CS was examined. It is considered the policies in the Core Strategy for supporting economic growth and investment in the District are still in general conformity with the NPPF in this regard. The LP review will consider new priorities for the area, based on the same overarching principles.
27.	Set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration.	NPPF Para 81	CS Vision, Strategic Objectives, plus policies CS.1, CS.15, CS.22, CS.23, CS.24, Area Strategies AS.1 to AS.11, SUA.1, SUA.2, SUA.4, Proposal GLH, Proposal LMA, REDD.1 and REDD.2 are relevant. While Policy CS.14 restricts certain types of business development in a specific part of the District, the Inspector who examined the Plan concluded that this was appropriate in the circumstances. Together, the CS provides a comprehensive and positive approach towards economic growth and investment in the District and are still in general conformity with the NPPF in this regard. The LP review will consider new priorities for the area, based on the same overarching principles and taking into account the latest sub-regional and local strategies for encouraging economic development that reflect the character of the area.
28.	Set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period.	NPPF Para 81	Proposals SUA.1, SUA.2, SUA.4, Proposal GLH, Proposal LMA, REDD.1 and REDD.2 all provide opportunities for economic development that are consistent with CS Vision, Strategic Objectives and policies which remain in general conformity with the NPPF.
29.	Seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment.	NPPF Para 81	Strategic Objectives and various policies in CS seek to ensure that these matters are addressed in order to facilitate economic investment and are in general conformity with the NPPF.

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30.	Be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances.	NPPF Para 81	Last paragraph of Policy CS.22 provides scope for additional employment sites to be provided should this be justified. This flexibility is in general conformity with para 81(d) of the NPPF.
31.	Recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations.	NPPF Para 82 *	The CS does not identify specific locational requirements for different employment sectors but policies and proposals provide scope and flexibility to respond to these across the District. However, this provision of the NPPF has not been amended since the CS was examined so it is reasonable to assume that its provisions remain in general conformity with it. The LP review will be used to consider whether specific sectoral requirements should be provided for through the allocation of suitable sites.
32.	Enable the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings.	NPPF Para 83	CS Vision, Strategic Objectives, plus policies CS.15, CS.22, CS.23, CS.24, CS.25 and AS.10 are relevant. They provide considerable scope for rural businesses to establish and develop and remain in general conformity with the NPPF.
33.	Enable the development and diversification of agricultural and other land-based rural businesses.	NPPF Para 83	Policy AS.10 provides considerable scope for rural, including farm-based, businesses to establish and develop and it remains in general conformity with the NPPF.
34.	Enable sustainable rural tourism and leisure developments which respect the character of the countryside.	NPPF Para 83	Policies CS.24 and AS.10 provide considerable scope for a wide range of tourism and leisure developments to establish and develop and they remain in general conformity with the NPPF.

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35.	Enable the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship.	NPPF Para 83	Area Strategies AS.1 to AS.10 and Policy CS.25 provide considerable scope for a wide range of local services and facilities to establish and develop and they remain in general conformity with the NPPF.
36.	Recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport.	NPPF Para 84 *	Policies CS.15, CS.22, CS.24 and AS.10 provide scope for local business and community needs to be met in such locations and they remain in general conformity with the NPPF.
37.	<i>Town centres</i>		
38.	Define a network and hierarchy of town centres and promote their long-term vitality and viability.	NPPF Para 85	CS Vision, Strategic Objectives, policies CS.15 and CS.23 and Area Strategies AS.1-AS.9 establish a network and hierarchy of town and rural centres and seek to ensure their future vitality and viability. They remain in general conformity with the NPPF. The LP review will consider how this should be revised to respond to changing circumstances due to the impact of Covid and changes to the retail sector.
39.	Define the extent of town centres and primary shopping areas, and make clear the range of uses permitted in such locations.	NPPF Para 85	Policy CS.22 and Area Strategies AS.1-AS.9 identify these matters and remain in general conformity with the NPPF. The LP review will consider how this should be revised to respond to changing circumstances due to the impact of Covid and changes to the retail sector.
40.	Retain and enhance existing markets and, where appropriate, re-introduce or create new ones.	NPPF Para 85	This matter is not covered specifically in the Core Strategy. The LP review can consider doing so.

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41.	Allocate a range of suitable sites in town centres to meet the scale and type of development likely to be needed, looking at least ten years ahead.	NPPF Para 85	The Core Strategy does not allocate sites as the evidence base did not identify the need to do so. The LP review will consider whether specific sites should be allocated to reflect the changing roles of town centres in the future.
42.	Where suitable and viable town centre sites are not available for main town centre uses, allocate appropriate edge of centre sites that are well connected to the town centre.	NPPF Para 85	The Core Strategy does not allocate sites as the evidence base did not identify the need to do so. The LP review will consider whether specific sites should be allocated to reflect the changing roles of town centres in the future.
43.	Recognise that residential development often plays an important role in ensuring the vitality of centres and encourage residential development on appropriate sites.	NPPF Para 85	Core Strategy policies CS.15 and CS.20 provide scope for residential development, including changes of use, in town and rural centres. They remain in general conformity with the NPPF. The LP review will consider how this should be revised to respond to changing circumstances due to the impact of Covid and changes to the retail sector.
44.	<i>Healthy and safe communities</i>		
45.	<p>Achieve healthy, inclusive and safe places which promote social interaction, are safe and accessible, and enable and support healthy lifestyles.</p> <p>[Criteria b) of Para 79 of the 2019 NPPF (para 80 of the 2021 consultation NPPF) would be amended to read "...through the use of <u>attractive</u>, clear and legible pedestrian <u>and cycle</u> routes..." when considering high quality public spaces.]</p>	NPPF Para 91	<p>Core Strategy Vision, Strategic Objectives, policies CS.9 and CS.25 and Area Strategies AS.1-AS.10 provide scope to achieve these goals. They remain in general conformity with the NPPF. The LP review will consider how these issues should be addressed in the future to reflect the needs of people and communities, including as a result of Covid.</p> <p>[These amendments are minor in nature and do not alter the overarching policy principles of achieving healthy and safe communities. As such, it is considered the CS would remain in general conformity with the NPPF should this revised wording be introduced.]</p>

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	<b>A. NPPF Requirement</b>	<b>B. NPPF Paragraph Reference</b>	<b>C. Record your assessment results</b>
46.	Plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments.	NPPF Para 92	Policy CS.25 and Area Strategies AS.1-AS.10 provide scope to achieve these goals. They remain in general conformity with the NPPF. The LP review will consider how these issues should be addressed in the future to reflect the needs of people and communities, including as a result of Covid.
47.	Take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community.	NPPF Para 92	Policy CS.25 and Area Strategies AS.1-AS.10 provide scope to achieve these goals. They remain in general conformity with the NPPF. The LP review will consider how these issues should be addressed in the future to reflect the needs of people and communities, including as a result of Covid.
48.	Guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs.	NPPF Para 92	Policy CS.25 provides the basis to avoid the loss of facilities and services. It remains in general conformity with the NPPF.
49.	Ensure that established shops, facilities and services are able to develop and modernise, and are retained for the benefit of the community.	NPPF Para 92	Core Strategy Strategic Objectives and Policy CS.25 provide the basis to ensure the adaptation and retention of shops, facilities and services. They remain in general conformity with the NPPF.
50.	Ensure an integrated approach to considering the location of housing, economic uses and community facilities and services.	NPPF Para 92	Core Strategy Vision, Strategic Objectives, Policy CS.15, Area Strategies AS.1-AS.10 and Proposals GLH and LMA provide scope to ensure an integrated approach. They remain in general conformity with the NPPF. The LP review will consider how this issue should be addressed in the future to reflect the needs of people and communities, including as a result of Covid.
51.	Consider the social, economic and environmental benefits of estate regeneration.	NPPF Para 93 *	This matter is not covered specifically in the Core Strategy. The LP review can consider doing so.

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	<b>A. NPPF Requirement</b>	<b>B. NPPF Paragraph Reference</b>	<b>C. Record your assessment results</b>
52.	Promote public safety and take into account wider security and defence requirements.	NPPF Para 95 *	Policy CS.9 covers this issue and is in general conformity with the NPPF.
53.	Provide open space, sports and recreational facilities which meets the needs of the local area.	NPPF Para 95	Core Strategy Vision, Strategic Objectives, policies CS.7 and CS.25 and Area Strategies AS.1-AS.10 cover this issue and are in general conformity with the NPPF.
54.	Protect and enhance public rights of way and access.	NPPF Para 98	Policies CS.9 and CS.25 cover this issue and are in general conformity with the NPPF.
55.	<i>Transport</i>		
56.	Should actively manage patterns of growth in support of objectives in Para 102. Significant development should be focused on locations which are/can be made sustainable. Opportunities to maximise sustainable transport solutions will vary between urban and rural areas - this should be taken into account in plan-making.	NPPF Para 103	Core Strategy Vision, Strategic Objectives and various policies and site specific proposals all establish the distribution and location of development. The overall strategy approach was deemed to be appropriate and sound by the Examination Inspector in the context of Stratford-on-Avon District. The approach remains in general conformity with the NPPF. The LP review will consider the most appropriate approach to the location of future development taking into account changing circumstances.
57.	Support an appropriate mix of uses across an area, and within larger scale sites, to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities.	NPPF Para 104	Core Strategy Vision, Strategic Objectives and various policies and site specific proposals all support the location and appropriate mix of uses. The overall strategy approach was deemed to be appropriate and sound by the Examination Inspector in the context of Stratford-on-Avon District. The approach remains in general conformity with the NPPF. The LP review will consider the most appropriate approach to the location of future development taking into account changing circumstances.

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	<b>A. NPPF Requirement</b>	<b>B. NPPF Paragraph Reference</b>	<b>C. Record your assessment results</b>
58.	Identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development.	NPPF Para 104	Policy CS.25 safeguards land for a range of transport-related schemes and is in general conformity with the NPPF.
59.	Provide for high quality walking and cycling networks and supporting facilities such as cycle parking (drawing on Local Cycling and Walking Infrastructure Plans).  [Criteria d) of Para 104 of the 2019 NPPF (para 105 of the 2021 consultation NPPF) would be amended to read “ <u>provide for high quality, well-designed walking and cycling networks and with supporting facilities such as secure cycle parking...</u> ”	NPPF Para 104	Policy CS.25 covers this issue and is in general conformity with the NPPF. The LP review will consider how this issue should be addressed in the future.  [When considering sustainable transport options. These amendments are minor in nature and do not alter the overarching policy principles of promoting sustainable transport. As such, it is considered the CS would remain in general conformity with the NPPF should this revised wording be introduced.]
60.	Provide for any large-scale transport facilities that need to be located in the area and the infrastructure and wider development required to support their operation, expansion and contribution to the wider economy.	NPPF Para 104 *	This matter is not covered specifically in the Core Strategy. The LP review will consider how this issue should be addressed in the future.
61.	Recognise the importance of maintaining a national network of general aviation airfields.	NPPF Para 104 *	Policy CS.25 covers this issue and is in general conformity with the NPPF.
62.	Provide adequate overnight lorry parking facilities, taking into account any local shortages.	NPPF Para 107 *	This matter is not covered specifically in the Core Strategy. The LP review will consider how this issue should be addressed in the future.

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	<b>A. NPPF Requirement</b>	<b>B. NPPF Paragraph Reference</b>	<b>C. Record your assessment results</b>
63.	<p>In assessing sites that may be allocated for development in plans, it should be ensured that: appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location; safe and suitable access to the site can be achieved for all users; and any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.</p> <p>[Para 108 of the 2019 NPPF (para 109 of the 2021 consultation version) introduces a new criteria c) as follows: <u>“the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Modal Design Code”</u>.]</p>	NPPF Para 108	<p>Development allocations in the Core Strategy have taken these matters fully into account.</p> <p>[This additional criteria does not alter the overarching policy principles of assessing sustainable transport matters. As such, it is considered the CS would remain in general conformity with the NPPF should this revised wording be introduced.]</p>
64.	<p>Development should only be prevented on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.</p>	NPPF Para 109	<p>Policy CS.25 covers this issue and is in general conformity with the NPPF.</p>
65.	<i>Communications</i>		

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	<b>A. NPPF Requirement</b>	<b>B. NPPF Paragraph Reference</b>	<b>C. Record your assessment results</b>
66.	Support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections, setting out how high-quality digital infrastructure is expected to be delivered and upgraded over time.	NPPF Para 112	Policy CS.26 F is relevant. The policy supports new development contributing to the expansion of high-speed broadband infrastructure and it requests strategic fibre connectivity for major infrastructure development. It requires innovative, alternative technologies to suit different local constraints/issues due to the rural nature of the District. It is considered the CS is in general conformity with the NPPF in this regard. There is no specific policy in the CS relating to the creation or up-grading of infrastructure necessary for service providers to expand electronic communication networks. This does not comply with the NPPF and must be a consideration of the LP review.
67.	<i>Making effective use of land</i>		
68.	Promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.	NPPF Para 117 *	CS Vision, Strategic Objectives, plus a wide range of policies and site allocations all seek to achieve the appropriate balance between meeting the development needs of the District and ensuring that the environment is safeguarded and improved. In this respect the CS remains in general conformity with the NPPF.
69.	Set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land.	NPPF Para 117 *	CS Vision, Strategic Objectives, plus policies CS.15, CS.22, CS.24, AS.10 and AS.11 emphasise the importance of utilising previously-developed land and provide considerable scope for this to happen. The CS is therefore in general conformity with the NPPF.
70.	Encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains.	NPPF Para 118	Various large-scale site allocations in the CS specify the importance of providing mixed uses and environmental gains. In this respect the CS remains in general conformity with the NPPF.

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	<b>A. NPPF Requirement</b>	<b>B. NPPF Paragraph Reference</b>	<b>C. Record your assessment results</b>
71.	Recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production.	NPPF Para 118	Various policies in the CS cover these issues although it is recognised that their inter-relationships could be strengthened. Nevertheless, the CS is in general conformity with the NPPF. The Local Plan review will provide the opportunity to address this matter in a more comprehensive manner.
72.	Give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land.	NPPF Para 118	CS Vision, Strategic Objectives, plus policies CS.15 and CS.22 in particular, emphasise the importance of utilising previously-developed land within settlements and provide considerable scope for this to happen. Proposal SUA.1 relates to a specific opportunity to regenerate an extensive part of the urban area of Stratford-upon-Avon. On that basis the CS remains in general conformity with the NPPF.
73.	Promote and support the development of under-utilised land and buildings.	NPPF Para 118	Policies CS.15, CS.20, CS.22, CS.24 and AS.10 all provide scope for existing land and buildings to be re-used and redeveloped. The CS is therefore in general conformity with the NPPF.
74.	Support opportunities to use the airspace above existing residential and commercial premises for new homes.	NPPF Para 118	This matter is not covered specifically in the Core Strategy. The LP review can consider doing so.
75.	Reflect changes in the demand for land.  [Criteria a) of Para 120 of the 2019 NPPF (para 121 of the 2021 consultation version) amends the emphasis of the LPA considering the appropriateness of Plan updates from “they” to “it”.]	NPPF Para 120	Various policies in the CS provide scope to respond to changing circumstances. It is therefore in general conformity with the NPPF. However, this provision of the NPPF relates more to the plan-making process and current policies and site allocations that have not been progressed will be reconsidered against changing circumstances in the LP review.  [This minor emphasis change does not alter the policy context and as such, it is considered the CS would remain in general

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	<b>A. NPPF Requirement</b>	<b>B. NPPF Paragraph Reference</b>	<b>C. Record your assessment results</b>
			conformity with the NPPF should this revised wording be introduced.]
76.	Support development that makes efficient use of land, taking into account the need for different types of housing and other forms of development, local market conditions, the availability and capacity of infrastructure and services, the character and setting of the area, and the importance of securing well-designed, attractive and healthy places.	NPPF Para 122 *	Various policies in the CS provide scope to ensure the efficient use of land while providing the necessary infrastructure and services and ensuring the character and quality of the area is maintained. It is therefore in general conformity with the NPPF.
77.	Avoid homes being built at low densities where there is an existing or anticipated shortage of identified housing needs, and where appropriate include the use of minimum density standards.  [Para 123 of the 2019 NPPF (para 124 of the 2021 consultation NPPF) introduces a new opening sentence: " <u>Area-based character assessments, codes and masterplans can be helpful tools in helping to ensure that land is used efficiently while also creating beautiful and sustainable places</u> ".]	NPPF Para 123 *	The CS does not specify densities for housing development. However, various policies, such as CS.9, seek to ensure that schemes are appropriate to the area. It is therefore in general conformity with the NPPF.  [This additional criteria does not alter the overarching policy principles of assessing appropriate development densities. As such, it is considered the CS would remain in general conformity with the NPPF should this revised wording be introduced.]
78.	<i>Design</i>		
79.	Set out a clear design vision and provide maximum clarity about design expectations.  [Para 125 of the 2019 NPPF (para 126 of the 2021 consultation NPPF) revises the final sentence to read: " <u>Neighbourhood plans planning groups can</u>	NPPF Para 125 & 126 *	Policies CS.5, CS.8, CS.9, CS.15, CS.18, CS.20, Area Strategies and AS.10 are relevant. Policy CS.9 is the main policy in the CS relating to design matters. Expectations relating to all forms of development encapsulating good design are embedded throughout all these policies, but CS.9 in particular. This policy sets out clear design principles, sufficiently flexible to reflect

	<b>A. NPPF Requirement</b>	<b>B. NPPF Paragraph Reference</b>	<b>C. Record your assessment results</b>
	<p>play an important role in identifying the special qualities of each area and explaining how this should be reflected in development, <u>both through their own plans and engaging in the production of design policy, guidance and codes by local planning authorities</u>”].</p> <p>[Para 126 of the 2019 NPPF (para 127 of the 2021 consultation NPPF) has been amended to read: “To provide maximum clarity about design expectations at an early stage, <u>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. These provide a local framework for creating beautiful and distinctive places with a consistent and high quality standard of design. Their level of detail and degree of prescription should be tailored to the circumstances and scale of change in each place, and should allow a suitable degree of variety where this would be justified. Plans or supplementary planning documents should use visual tools such as design guides and codes. These provide a framework for creating distinctive places, with a consistent and high quality standard of design. However, their level of detail and degree of prescription should be tailored to the circumstances in each place, and should allow a suitable degree of variety where this would be justified.”]</u></p>		<p>local distinctiveness. Reference is made to Village Design Statements at para 3.8.4 and local design policies within Neighbourhood Plans at para 3.8.7 of the CS. The design policies in the CS are therefore considered to be in general conformity with the NPPF.</p> <p>The Council’s Development Requirements SPD provides additional guidance on interpretation and implementation of CS policies – particularly those relating to design issues set out in the NPPF. The CS does not specifically set out design parameters for employment and commercial sites – this will need to be considered through the LP Review.</p> <p>[Para 126 (2021 NPPF) The proposed amendment links Neighbourhood Planning more closely to overarching design principles/codes. The role of Neighbourhood Planning is acknowledged in the CS and as such would remain in general conformity with the NPPF.]</p> <p>[Para 127 (2021 NPPF) The re-wording of this paragraph does not alter the general thrust of the design requirements of the NPPF. The main change is in the clarification that there is a requirement for local planning authorities to prepare design guides or codes. The intention to produce a National Model Design Code (NMDC) was set out in Part 3 of the National Design Guide, published in October 2019. The Guide suggests that a Model Design Code will “set a baseline standard of quality and practice across England” and help to “set out clear parameters for what good quality design looks like (in a particular area)”. The Council has a suite of design guidance known as the Development Requirements Supplementary Planning Document (SPD). The SPD is split into individual parts,</p>

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	<b>A. NPPF Requirement</b>	<b>B. NPPF Paragraph Reference</b>	<b>C. Record your assessment results</b>
			<p>each considering a different design topic. All parts of the SPD (except for Climate Change Adaptation and Mitigation) were adopted pre-October 2019 and as such, they do not refer specifically to the NMDC. The various parts of the SPD will need to be updated in due course and will need to reflect up-to-date Government guidance. The revised design guides or codes will need to underpin the Local Plan review process]. Whilst the Core Strategy cannot reference the NMDC, it is considered that the current Development Requirements SPD is consistent with the principles set out in the National Design Guide and is therefore consistent with the NPPF in this regard].</p>
80.	<p>Ensure that developments will function well and add to the overall quality of the area, are visually attractive as a result of good architecture, layout and appropriate and effective landscaping, are sympathetic to local character and history, including the surrounding built environment and landscape setting, establish or maintain a strong sense of place, optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development, and create places that are safe, accessible and inclusive.</p>	NPPF Para 127	<p>Policies CS.5, CS.6, CS.7, CS.8, CS.9, CS.11, CS.12, CS.15, CS.18, CS.19, CS.20, CS.21, Area Strategies and CS.25 are relevant. Various elements of all these policies ensure that the matters set out in the NPPF relating to the attractiveness of development, use of good quality design, development being sympathetic to local character and history and the inclusion of green spaces etc (as set out in para 127) ensure that the CS is in general conformity with the NPPF.</p>

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81.	<i>Green Belt</i>		
82.	Set out proposals for new Green Belts within strategic policies. This should demonstrate why normal planning and development management policies would not be adequate, any major changes in circumstances, consequences for sustainable development, the need for Green Belt to support adjoining areas, and how new Green Belt would meet other objectives of the Framework.	NPPF Para 135	Policy CS.10 sets out the approach to development in the Green Belt and is in general conformity with the NPPF. The LP review will consider whether Green Belt boundaries should be altered.
83.	Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period. Where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies, including neighbourhood plans. Even when exceptional circumstances are demonstrated strategically to take land out of the Green Belt, it is still necessary to demonstrate that exceptional circumstances exist at the site level.	NPPF Para 136	The CS identifies two areas of land to be removed from the Green Belt based on exceptional circumstances. These were supported by the Inspector who examined the Plan so are in general conformity with the NPPF. The LP review will consider whether Green Belt boundaries should be altered.

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84.	Strategic policies should make as much use as possible of suitable brownfield sites and underutilised land and optimise the density of development including promoting an uplift in minimum density standards in town and city centres and locations well served by public transport. Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport. They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.	NPPF Para 137 & 138	Various policies in the CS provide scope to ensure the efficient use of land within urban areas in the District for development. The CS identifies two areas of land to be removed from the Green Belt based on exceptional circumstances. These were supported by the Inspector who examined the Plan. The CS is in general conformity with the NPPF in these respects. The LP review will consider whether Green Belt boundaries should be altered.
85.	When defining Green Belt boundaries, plans should ensure consistency with the development plan's strategy for meeting identified requirements for sustainable development, not include land which it is unnecessary to keep permanently open, identify areas of safeguarded land between the urban area and the Green Belt where necessary, make clear that the safeguarded land is not allocated for development at the present time, be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period, and define boundaries clearly.	NPPF Para 139	The production of the CS considered these issues. It identifies two areas of land to be removed from the Green Belt based on exceptional circumstances. These were supported by the Inspector who examined the Plan. The CS is in general conformity with the NPPF in these respects. The LP review will consider whether Green Belt boundaries should be altered.

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86.	<i>Climate change, flooding and coastal change</i>		
87.	Take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperature.	NPPF Para 149	Policies CS.2, CS.3 and CS.4 are relevant. The CS was adopted against the provisions of para 99 of the 2012 NPPF which are encompassed within para 149 of the 2019 NPPF. The issue of rising temperatures (which is an addition to the 2019 version NPPF) is covered by point A.2 of policy CS.2. As such, these policies remain in general conformity with the NPPF. Since the adoption of the CS, the Council has declared a Climate Emergency (at Council on 15.07.2019). Part 'V' of the Council's Development Requirements SPD 'Climate Change Adaption and Mitigation' was adopted in July 2020. The issue of Climate Change will be a fundamental issue for the LP review to consider.
88.	Support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts such as providing space for physical protection measures, or making provision for the possible future relocation of vulnerable development and infrastructure.	NPPF Para 149	Policy CS.2 is relevant. The CS is silent on this issue. This is an addition to the requirements set out in the 2012 NPPF under which the CS was created and Examined. There is nothing in the CS that contradicts this requirement and as such its silence does not render the CS non-compliant with the NPPF. However, this issue will need to be considered through the LP review process.
89.	Increase the use and supply of renewable and low carbon energy and heat by providing a positive strategy for energy from these sources, identifying suitable areas for renewable and low carbon energy sources, and identifying 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.	NPPF Para 151	Policies CS.2 and CS.3 are relevant. Policies refer to prioritising decentralised energy supply and providing energy from renewable or low-carbon energy sources such as District Heating (amongst others). CS.3 also encourages the identification of District Heating priority areas and the incorporation of appropriate infrastructure. It is therefore considered that the CS is in general conformity with the NPPF in this regard.
90.	Strategic policies should manage flood risk from all sources and should be informed by a Strategic Flood Risk Assessment.	NPPF Para 156	Policy CS.4 is relevant. The CS was informed by a SFRA and adopted in accordance with para 100 of the 2012 NPPF which is the equivalent para 156 in the 2019 NPPF and policy CS.4

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			confirms the requirement to manage flood risk from all sources. The CS is in general conformity with the NPPF in this regard.
91.	Reduce risk from coastal change by avoiding inappropriate development in vulnerable areas and not exacerbating the impacts of physical changes to the coast.	NPPF Para 167	Not applicable.

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92.	<i>Natural environment</i>		
93.	Contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils, recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services.	NPPF Para 170	Policies CS.4, CS.5, CS.6, CS.7, CS.11, CS.12, CS.13 and Area Strategies are relevant. The suite of policies in the CS adhere to the principles set out in the NPPF in relation to the protection and enhancement of the natural environment. The CS is silent on the economic and other benefits of the best and most versatile agricultural land. However, there is nothing in the CS to contradict the NPPF on this specific issue. As such, it is considered the CS is in general conformity with the NPPF in this regard.
94.	Plans should: distinguish between the hierarchy of international, national and locally designated sites, take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure, and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.	NPPF Para 171	Policies CS.6, CS.11, CS.12 and CS.13 are relevant. The policies list the hierarchy of designated sites and look to maintain and enhance networks of habitats and green infrastructure. The CS is silent on matters relating to the use of poorer quality agricultural land where significant development of such land is demonstrated to be necessary. The CS is also silent on planning for the enhancement of natural capital across local authority boundaries. However, there is nothing in the CS to contradict the NPPF on these specific issues. As such, it is considered the CS is in general conformity with the NPPF in this regard. The cross-boundary catchment issue could be a matter for the LP Review.
95.	Conserve the special character and importance of Heritage Coast areas.	NPPF Para 173	Not applicable.
96.	Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species, and identify and pursue opportunities for securing measurable net gains for biodiversity.	NPPF Para 174	Policies CS.2, CS.3, CS.4, CS.6 and CS.7 + Policies maps are relevant. Priority habitats have been mapped and the policies echo the requirements and policy principles set out in the NPPF. It is considered the CS is in general conformity with the NPPF in this regard.

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97.	Ensure that a site is suitable for its proposed use taking account of ground conditions, any risks arising from land instability and contamination, and the likely effects of pollution on health, living conditions and the natural environment.	NPPF Para 178 & 180	Policies CS.11, CS.14 and AS.11 are relevant. These three policies refer to the impact of noise and light pollution, but only in specific parts of the District and for very specific reasons (i.e. Cotswolds Area of Outstanding Natural Beauty and Vale of Evesham Control Zone) which does relate to NPPF para 180 b) in particular. There is no 'District wide' policy stance on issues of ground conditions, contamination or land remediation even though the District has a number of large brownfield sites with previous uses which could have caused land contamination and whose development could cause environmental impacts such as noise and light pollution. Since the CS is silent on such matters, it is not lacking conformity with the NPPF and the NPPF would take precedence on such issues.
98.	Sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas.	NPPF Para 181	Area Strategies – policies AS.1 and AS.8, plus policy CS.26 are relevant. However, these references are specific to certain locations and not District wide initiatives. Policy CS.26 looks to support schemes and initiatives that address local issues, such as community transport, road safety, parking, congestion and air quality. There is no strategic policy stance to contribute to compliance with national objectives on such matters. Since the CS is silent on strategic issues, it is not lacking conformity with the NPPF and the NPPF would take precedence in a wider context.
99.	Ensure that new development can be integrated effectively with existing businesses and community facilities.	NPPF Para 182	Policies CS.22 and AS.10 of the CS encourage and support new business and commercial opportunities providing the proposal will not harm the character of the area. However, there is no specific policy ensuring unreasonable restrictions are not placed on existing businesses and facilities following the re-development of adjacent sites (for residential purposes, for example). Whilst the CS is silent on strategic issues, it is not lacking conformity with the NPPF and the NPPF would take precedence on this particular matter.
100. <i>Historic Environment</i>			

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101.	Set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats.	NPPF Para 185	Policy CS.8 relevant. The policy gives priority to protecting and enhancing all historic and cultural assets. The thrust of the policy is consistent with the NPPF, whilst not referring specifically to wider social, cultural and economic benefits. Environmental benefits are outlined. However, the CS policy does not consider heritage assets 'most at risk' as specified in the NPPF. Despite this, the policy is deemed to be in general conformity with the NPPF. Elements of the NPPF not specifically covered by the CS can be considered through the Local Plan review.
102.	<i>Minerals</i>		
103.	Provide for the extraction of mineral resources of local and national importance.	NPPF Para 204	Not applicable – not dealt with through the Core Strategy. Minerals extraction dealt with by Warwickshire County Council through the saved policies from the Minerals Local Plan (1995) and emerging Warwickshire Minerals Plan (examined in October 2020).
104.	Take account of the contribution that substitute or secondary and recycled materials and minerals waste would make to the supply of materials, before considering extraction of primary materials.	NPPF Para 204	Not applicable – not dealt with through the Core Strategy. Minerals extraction dealt with by Warwickshire County Council through the saved policies from the Minerals Local Plan (1995) and emerging Warwickshire Minerals Plan (examined in October 2020).
105.	Safeguard mineral resources by defining Mineral Safeguarding Areas.  [Para 204 of the 2019 NPPF (para 209 of the 2021 consultation NPPF) adds 'Mineral Consultation Areas' to the list of resources to be defined and identified by planning policies in relation to known mineral locations].	NPPF Para 204	The CS does not make reference to mineral safeguarding areas or indicate on the policies map locations of known specific minerals resources of local and national importance, to ensure they are not sterilised by non-mineral development. These issues are covered by the Warwickshire Minerals Local Plan and the issue dealt with through the planning application process.  [This additional request would also need to be considered through the LP Review process].

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106.	Encourage the prior extraction of minerals, where practical and environmentally feasible, if it is necessary for non-mineral development to take place.	NPPF Para 204	Not applicable – not dealt with through the Core Strategy. Minerals extraction dealt with by Warwickshire County Council through the saved policies from the Minerals Local Plan (1995) and emerging Warwickshire Minerals Plan (examined in October 2020).
107.	Safeguard existing, planned and potential sites for: the bulk transport, handling and processing of minerals, the manufacture of concrete and concrete products and the handling, processing and distribution of substitute, recycled and secondary aggregate material.	NPPF Para 204	Not applicable – not dealt with through the Core Strategy. Minerals extraction dealt with by Warwickshire County Council through the saved policies from the Minerals Local Plan (1995) and emerging Warwickshire Minerals Plan (examined in October 2020).
108.	Set out criteria or requirements to ensure that permitted and proposed operations do not have unacceptable adverse impacts on the natural and historic environment or human health	NPPF Para 204	Not applicable – not dealt with through the Core Strategy. Minerals extraction dealt with by Warwickshire County Council through the saved policies from the Minerals Local Plan (1995) and emerging Warwickshire Minerals Plan (examined in October 2020).
109.	Recognise that some noisy short-term activities, which may otherwise be regarded as unacceptable, are unavoidable to facilitate minerals extraction	NPPF Para 204	Not applicable – not dealt with through the Core Strategy. Minerals extraction dealt with by Warwickshire County Council through the saved policies from the Minerals Local Plan (1995) and emerging Warwickshire Minerals Plan (examined in October 2020).
110.	Ensure that worked land is reclaimed at the earliest opportunity, taking account of aviation safety, and that high-quality restoration and aftercare of mineral sites takes place.	NPPF Para 204	Not applicable – not dealt with through the Core Strategy. Minerals extraction dealt with by Warwickshire County Council through the saved policies from the Minerals Local Plan (1995) and emerging Warwickshire Minerals Plan (examined in October 2020).