

Title: **Core Strategy Review Assessment Update**

Lead Officer: **Graham Nelson, Interim Head of Development**
(01789 260804)

**Portfolio Holder/
Lead Member:** **Councillor G Cowcher**

Summary

Local Planning Authorities are required to assess whether their local plan policies need updating at least once every five years. This was last done in April 2021 when the assessment confirmed that the Core Strategy remained up to date. This report presents The Cabinet with an assessment of the Core Strategy policies against the provisions of the current National Planning Policy Framework (NPPF) which was significantly updated in 2024.

It concludes that in key respects, notably in relation to housing land supply, Core Strategy Policies need to be considered as out of date. Many other policies in the Core Strategy remain in conformity with national policy in the NPPF and as such can continue to attract full weight in the decision-making process.

Recommendation

That The Cabinet recommends that Council formally endorses the findings of the review assessment set out in Appendix 1 providing details of which of the Core Strategy policies are considered to remain up to date.

1 Background/Information

- 1.1 The requirement to carry out a review of policies at least every five years is a legal requirement for all local plans, as set out in Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012). The Core Strategy was adopted in July 2016 and as required, the Council has undertaken an assessment of whether it remained up to date in 2021. This assessment concluded that that the Core Strategy did remain up to date and was endorsed by Council at its meeting on 19 April 2021.
 - 1.2 Paragraph 34 of the NPPF (footnotes removed for simplicity) states that "Policies in local plans and spatial development strategies should be reviewed to assess whether they need updating at least once every five years and should then be updated as necessary". Reviews should be completed no later than five years from the adoption date of a plan and should take into account changing circumstances affecting the area, or any relevant changes in national policy.
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Relevant strategic policies will need updating at least once every five years if their applicable local housing need figure has changed significantly; and they are likely to require earlier review if local housing need is expected to change significantly in the near future.

- 1.3 This policy review has been carried out to comply with the legal requirements as highlighted above. The Core Strategy policies have been assessed against the current version of the NPPF (dated December 2024 but with minor subsequent updates) related Planning Practice Guidance, other relevant national policies and Stratford-on-Avon District Council's (SDC) own evidence base.
- 1.4 No assessment has been conducted against the draft NPPF that underwent consultation until 10 March. This is a very significant rewrite of the NPPF and may impact further on the weight that can be afforded to the policies in the Core Strategy. A final version of this document is expected to be published before the summer parliamentary recess and further consideration of its implications may be needed then.
- 1.5 Previously the Council used a toolkit created by the Local Government Association's Planning Advisory Service (PAS) to guide the assessment. This approach is a two stage approach which leads to an assessment of whether a review of the Core Strategy is necessary and if so where policy content is in need of updating. As SDC have already deemed it appropriate to produce a new Local Plan, this is relatively advanced in preparation, and its policy content will entirely supersede the existing Core Strategy it is not considered necessary to repeat this approach. Instead, **Appendix 1** provides a simpler policy by policy assessment of the extent of conflict between the Core Strategy policies and national planning policy and guidance.
- 1.6 It is expected that the South Warwickshire Local Plan will be formally submitted to Government for examination before the year end. Its emerging policy content will be capable of being a material planning consideration and carrying some weight in planning decision taking following its endorsement by the respective Councils. This weight will initially be somewhat limited but will increase as the plan nears adoption.

2 Options available to The Cabinet

- 2.1 The following options are available:
 - 2.2 Option 1 - Recommend that the assessment on the continued conformity of Core Strategy policies against the provisions of the NPPF as set out in **Appendix 1** is formally endorsed, and that the Core Strategy remains partially up to date and continues in part to provide an appropriate basis on which to plan for Stratford-on-Avon District to 2031.
 - 2.3 Option 2 - Amend the assessment on the continued general conformity of Core Strategy policies against the provisions of the NPPF as set out in **Appendix 1** and recommend Council to endorse an amended version.
 - 2.4 Option 3 - Not to recommend that the assessment set out in **Appendix 1** is formally endorsed and conclude that the Core Strategy is no longer up to date.
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3 Evidence Base

3.1 **Appendix 1** sets out the Council's assessment of the currency of Core Strategy policies. The outcomes of this assessment are as follows:

Policies that are considered to remain up-to-date are CS.1, CS.2, CS.3, CS.4, CS.5, CS.6, CS.7, CS.8, CS.9, CS.11, CS.12, CS.14, CS.17, CS.18, CS.19, CS.20, CS.24, AS1-9, AS.11, CS.25, CS.26, CS.27.

Policies that are considered to be out of date are: CS.13, CS.15, CS.16, CS.21. Although it should be noted that these include key policies concerning housing land supply.

Policies that are considered to be only partially up to date are CS.10, CS.22, CS.23, AS.10. Again, it should be noted that in relation to application of national grey belt policy, strategic employment land provision and the protection of the countryside from housing development these are significant.

4 Consultation and Members' comments

4.1 The currency assessment of various policies related to housing supply were subject to public consultation in February and March 2026 as part of the preparation of the Interim Policy Position Statement which is due to be considered by The Cabinet as part of the update report on efforts to improve housing land supply. Views expressed on this consultation have been taken into account in the preparation of **Appendix 1**. No further public consultation has been considered necessary.

4.2 Councillor George Cowcher is fully supportive of this report and is pleased that so much of the current Core Strategy policy content can continue to be treated as being up to date and will be able to guide development in the District until it is superseded by the emerging South Warwickshire Local Plan.

5 Implications of the proposal

5.1 *Legal Implications*

5.1.1 Publishing an assessment of whether the Council's Core Strategy remains up to date at least every five years from date of adoption is a legal requirement.

5.2 *Financial*

5.2.1 No direct issues identified. Budgetary resources have already been identified for the preparation of the South Warwickshire Local Plan.

5.3 *Council Plan*

5.3.1 The assessment will help the Council to continue to deliver against several of the objectives of the Council Plan, including:

Residents and Communities - acting in the best interest of residents and communities throughout the District;

Local Economy - creating a larger, stronger, greener and more inclusive economy;

Climate Change - leading the fight against climate change;

Housing - delivering affordable well built and maintained homes; and
Health and Wellbeing - putting health and wellbeing at the heart of decisions.

5.4 ***Environmental/Climate Change Implications***

5.4.1 The 2021 assessment noted there were aspects of the policy content of the Core Strategy that were not as strong as desired in relation to Climate Change. This remains the case and the only way of addressing this will be through the production of the SWLP.

5.5 ***Analysis of the effects on Equality***

5.5.1 No impacts identified.

5.6 ***Data Protection***

5.6.1 No issues identified.

5.7 ***Health and Wellbeing***

5.7.1 No issues identified.

5.8 ***Human Resources/Staffing***

5.8.1 No significant issues identified. In providing clarity over how up to date Core Strategy policies are it is hoped to reduce scope for argument over the weight that can be attached to them in reaching planning decisions and so not harm the efficiency of the operation of the planning service.

6 Risk Assessment

6.1 There are many risks associated with the Core Strategy having out of date policies. These can be financial, reputational and sometimes legal. On a day to day level, out of date policies can lead to the potential for an influx of unplanned development through speculative planning applications. These risks have already manifested themselves with regard to housing since the publication of the 2024 NPPF and resultant loss of the required housing land supply. Through providing clarity that some of the policy content of the Core Strategy remains up to date the risk of seeing similar impacts in regard to retail and employment developments is minimised. Also retaining infrastructure policies assist in mitigating the impacts of where development does occur in locations contrary to the current Core Strategy.

7 Conclusion/Reasons for the Recommendation

7.1 For the reasons described above it is proposed that The Cabinet recommends that full Council endorses **Appendix 1** and resolves that the policies identified in it as such remain either partially or wholly up to date.

Graham Nelson

INTERIM HEAD OF DEVELOPMENT

Background papers:

Please provide a list of any papers which you have referred to in compiling this report and are not published documents. This is a legal requirement. You must also supply these when submitting the report.

Supporting documents:

Not a legal requirement but may assist in identifying documents you have referred to in producing the report.

Form A1

INITIAL SCREENING FOR STRATEGIES/POLICIES/FUNCTIONS FOR EQUALITIES RELEVANCE TO ELIMINATE DISCRIMINATION, PROMOTE EQUALITY AND FOSTER GOOD RELATIONS

1. Please provide a summary of the proposal (including any legislation/guidance if relevant)

To consider whether the policies in the Council's current Core Strategy can continue to be treated as up-to-date

2. Tick **all** of the coloured boxes appropriately depending on degree of relevance/priority to each of the equality strands set out below following an assessment of the **OVERALL IMPACT DESCRIPTORS**.

High relevance/priority	Medium relevance/priority	Low or no relevance/ priority
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Business Unit/ Services:	Relevance/Risk to Equalities																		
State the Function/ Policy /Service/ Strategy being assessed:	Gender	Race	Disability	Sexual Orientation	Religion/Belief	Age	Gender Reassignment	Pregnancy/ Maternity	Marriage/ Civil Partnership (only for staff)	Gender	Race	Disability	Sexual Orientation	Religion/Belief	Age	Gender Reassignment	Pregnancy/ Maternity	Marriage/ Civil Partnership (only for staff)	
	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
		X											X					X	

OVERALL IMPACT DESCRIPTORS

The following descriptors are designed to help the assessor understand the potential equalities implications of the decision/proposal.

	Low or no relevance/priority (Green)	Medium relevance/priority (Orange)	High relevance/priority (RED)
LEGAL	Complaint/ initial challenge - may be easily resolved	Internal investigation following a number of complaints/ challenges	High level challenge resulting in Judicial Review / Ombudsman Complaint following unresolved complaints/ challenges
FINANCIAL	Little or no additional financial implication as a result of the decision/ proposal	Medium level financial implications - internal legal costs & internal resources	High or even severe financial impact - External legal advice and internal resources

	Low or no relevance/priority (Green)	Medium relevance/priority (Orange)	High relevance/priority (RED)
PEOPLE	No or Low or level of impact on isolation, quality of life, achievement, access to services. Unlikely to result in harm or injury. Mitigating actions are sufficient	Significant quality of life issues i.e. Achievement, access to services. Minor to significant levels of harm, injury. mistreatment or abuse OR, low level of impact that is possible or likely to occur with over 500 people potentially affected	Serious Quality of Life issues i.e. Where isolation increases or vulnerability is greatly affected as a result. Death, Injury and/or serious mistreatment or abuse of an individual for whom the Council has a responsibility OR, a medium level of impact that is likely to occur with over 500 people potentially affected
REPUTATION	Little or no impact outside of the Council	Some negative local media reporting	High levels of negative front page reports/ National attention and media coverage

3. If low or no relevance please complete the Equalities Section in the applicable Committee Report.

4. If Medium or High relevance/priority please complete the Equality Impact Assessment form (to be attached to the Committee Report as an Appendix).

Report Information Sheet

Please complete and submit to Democratic Services with report

Committee / Date	Cabinet 13 th April
Title of report	Core Strategy Review Assessment Update

Consultee	Date	Name
Ward Members(s)		N/A
Portfolio Holder/Committee Chairperson	tbc	George Cowcher
Financial Services		Richard Burrell
Legal Services		Nigel Bell
Human Resources		N/a
Other Services		N/a
Chief Executive (if applicable)		N/a
Respective Head of Service		N/a (report author)
Other organisations		N/a

Final decision by this Committee or rec to another Committee / Council?	Yes/ No Recommendation to: Cabinet / Council Committee
Contrary to Policy / Budget framework?	No /Yes
Does this report contain exempt info/Confidential? If so, which paragraph(s)?	No /Yes, Paragraphs:
Does this report relate to a key decision (referred to in the Cabinet Forward Plan)?	No/Yes, Forward Plan item – scheduled for (date)