

PAS LOCAL PLAN ROUTE MAPPER TOOLKIT PART 1: LOCAL PLAN REVIEW ASSESSMENT

Why you should use this part of the toolkit

The following matrix will assist you in undertaking a review of policies within your plan to assess whether they need updating.

The matrix is intended to supplement the [National Planning Policy Framework](#) (NPPF) (paragraph 33 in particular) and the associated [National Planning Practice Guidance](#) on the review of policies within the plan. Completing the matrix will help you understand which policies may be out of date for the purposes of decision making or where circumstances may have changed and whether or not the policy / policies in the plan continue to be effective in addressing the specific local issues that are identified the plan. This in turn will then help you to focus on whether and to what extent, an update of your policies is required. We would recommend that you undertake this assessment even if your adopted local plan already contains a trigger for review which has already resulted in you knowing that it needs to be updated. This is because there may be other policies within the plan which should be, or would benefit from, being updated.

This part of the toolkit deals only with local plan review. Part 2 of the toolkit sets out the content requirements for a local plan as set out in the NPPF. Part 3 of the toolkit outlines the process requirements for plan preparation set out in legislation and the NPPF. Soundness and Plan Quality issues are dealt with in Part 4 of the toolkit.

How to use this part of the toolkit

Before using this assessment tool it is important that you first consider your existing plan against the key requirements for the content of local plans which are included in the [Planning and Compulsory Purchase Act 2004 \(as amended\)](#); [The Town and Country Planning \(Local Planning\) \(England\) Regulations 2012 \(as amended\)](#) and the most up to date NPPF. To help you with this **Part 2 of the toolkit** provides a checklist which sets out the principal requirements for the content and form of local plans against the relevant paragraphs of the [NPPF](#). Completing **Part 2 of the toolkit** will help you determine the extent to which your current plan does or does not accord with relevant key requirements in national policy. This will assist you in completing question 1 in the assessment matrix provided below, and in deciding whether or not you need to update policies in your plan, and to what extent.

To use the matrix, consider each of the statements listed in the “requirements to consider” column against the content of your current plan. You will need to take into consideration policies in all development plan documents that make up your development plan, including any ‘made’ neighbourhood plans and/ or any adopted or emerging Strategic Development Strategy. For each statement decide whether you:

- Disagree (on the basis that your plan does not meet the requirement at all);
- Agree (on the basis that you are confident that your current plan will meet the requirement)

Some prompts are included to help you think through the issues and support your assessment. You may wish to add to these reflecting on your own context.

Complete all sections of the matrix as objectively and fully as possible. Provide justification for your conclusions with reference to relevant sources of evidence where appropriate. You will need an up to date Authority Monitoring Report, your latest Housing Delivery Test results, 5 year housing land supply position and the latest standard methodology housing needs information. You may also need to rely on or update other sources of evidence but take a proportionate approach to this. It should be noted that any decision not to update any policies in your local plan will need to be clearly evidenced and justified.

How to use the results of this part of the toolkit

The completed assessment can also be used as the basis for, or as evidence to support, any formal decision of the council in accordance with its constitution or in the case of, for example, Joint Planning Committees, the relevant Terms of Reference in relation to the approach to formal decision-making, as to why an update to the local plan is or is not being pursued. This accords with national guidance and supports the principle of openness and transparency of decision making by public bodies.

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
A	PLAN REVIEW FACTORS		
A1.	<p>The plan policies still reflect current national planning policy requirements.</p> <p>PROMPT: As set out above in the introductory text, in providing your answer to this statement consider if the policies in your plan still meet the ‘content’ requirements of the current NPPF (completing Part 2 of the toolkit will help you determine the extent to which the policies in your plan accord with relevant key requirements in national policy).</p>	Agree	<p>Reason (with reference to plan policies, sections and relevant evidence):</p> <p>See assessment of policy compliance for the two Core Strategies and the Joint Development Management Policies Local Plan Document.</p> <p>See also Part 2 of the toolkit.</p>
A2.	<p>There has not been a <u>significant</u> change in local housing need numbers from that specified in your plan (accepting there will be some degree of flux).</p> <p>PROMPT: Look at whether your local housing need figure, using the standard methodology as a starting point, has gone up significantly (with the measure of significance based on a comparison with the housing requirement set out in your adopted local plan).</p> <p>Consider whether your local housing need figure has gone down significantly (with the measure of significance based on a comparison with the housing requirement set out in your adopted local plan). You will need to consider if there is robust evidence to demonstrate that your current housing requirement is deliverable in terms of market capacity or if it supports, for example, growth strategies such as Housing Deals, new strategic infrastructure investment or formal agreements to meet unmet need from neighbouring authority areas.</p>	Agree	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>The housing requirement for the former St Edmundsbury area is the LHN figure, as the strategic policy requirement as set out in the Core Strategy adopted 2010 is more than five years old. For the purpose of this assessment the LHN figure is considered appropriate and has been applied. The LHN figure for the former St Edmundsbury area is derived as 454 dpa.</p> <p>The Forest Heath Single Issue Review was adopted on 19 September 2019 and sets a requirement for 340 dpa. This figure is lower than the local housing need figure of 362 dpa for the former Forest Heath area. Given the local housing need sets a minimum annual housing need it is reasonable to use the LHN figure for the former Forest Heath area which allows a combined figure for West Suffolk of 816 using a consistent approach.</p>

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
A3.	<p>You have a 5-year supply of housing land</p> <p>PROMPT: Review your 5-year housing land supply in accordance with national guidance including planning practice guidance and the Housing Delivery Test measurement rule book</p>	Agree	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>As at 31 March 2019 West Suffolk Council has a 6.2-year supply of housing land including a 5% buffer using the Sedgefield approach in measuring the housing supply covering the period 1 April 2019 to 31 March 2024.</p>
A4.	<p>You are meeting housing delivery targets</p> <p>PROMPT: Use the results of your most recent Housing Delivery Test, and if possible, try and forecast the outcome of future Housing Delivery Test findings. Consider whether these have/are likely to trigger the requirement for the development of an action plan or trigger the presumption in favour of sustainable development. Consider the reasons for this and whether you need to review the site allocations that your plan is reliant upon. In doing so you need to make a judgement as to whether updating your local plan will support delivery or whether there are other actions needed which are not dependent on changes to the local plan.</p>	Agree	<p>The West Suffolk Housing Delivery Study (March 2019) identifies that past delivery has been stable and that recent shortfalls have been attributable to the global financial crisis. There is little evidence of planning permissions lapsing on larger sites in West Suffolk. While permissions on some smaller sites have lapsed, this remains comparatively rare and does not significantly affect the overall supply of new homes in the area. It is too early to forecast the potential impact of the Covid-19 crisis on the delivery of housing, but this is a nationwide issue that will be monitored and reviewed through the 5-year land supply and Housing Action Plan.</p>
A5.	<p>Your plan policies are on track to deliver other plan objectives including any (i) affordable housing targets; and (ii) commercial floorspace/jobs targets over the remaining plan period.</p> <p>PROMPT: Use (or update) your Authority Monitoring Report to assess delivery.</p>	Agree	<p>Affordable housing delivery was 34.5% in Forest Heath area for 2018/2019 (target between 20 and 30%) and 26.8% in St Eds area (target 30%). The small shortfall in one area could be attributed to some sites falling below the threshold for provision, or off-site contributions. Source – AMR. Commercial floorspace delivery is no longer monitored by AMR, but since completion of Eastern Relief Road, significant areas of commercial floorspace have been delivered (54,737m² completed to date) and more is programmed.</p>

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
A6.	<p>There have been no significant changes in economic conditions which could challenge the delivery of the Plan, including the policy requirements within it.</p> <p>PROMPT: A key employer has shut down or relocated out of the area.</p> <p>Up-to-date evidence suggests that jobs growth is likely to be significantly more or less than is currently being planned for.</p> <p>Consider if there is any evidence suggesting that large employment allocations will no longer be required or are no longer likely to be delivered.</p> <p>You will need to consider whether such events impact on assumptions in your adopted local plan which have led to a higher housing requirement than your local housing need assessment indicates.</p> <p>Consider what the consequences could be for your local plan objectives such as the balance of in and out commuting and the resultant impact on proposed transport infrastructure provision (both capacity and viability), air quality or climate change considerations.</p>	Agree	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>The latest forecasts are contained within the Forest Heath Employment Land Review (October 2016) and the St Edmundsbury Employment Land Review (May 2017), both prepared by Lichfields. These are informed by the 2016 East of England Forecasting Model (EEFM).</p> <p>There will clearly be large and ongoing economic impact from the Covid-19 crisis in the local area. This is a nationwide issue that will require monitoring and review and consideration during the preparation of the West Suffolk Local Plan.</p>

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
A7.	<p>There have been no significant changes affecting viability of planned development.</p> <p>PROMPT: You may wish to look at the Building Cost Information Service (BCIS) All-in Tender Price Index, used for the indexation of Community Infrastructure Levy (CIL), or other relevant indices to get a sense of market changes.</p> <p>Consider evidence from recent planning decisions and appeal decisions to determine whether planning policy requirements, including affordable housing, are generally deliverable.</p> <p>Ongoing consultation and engagement with the development industry may highlight any significant challenges to delivery arising from changes in the economic climate.</p>	Agree	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>Officers undertake ongoing consultation and engagement with the development industry which will highlight any significant challenges to delivery arising from changes in the economic climate in light of Covid-19.</p>
A8.	<p>Key site allocations are delivering, or on course to deliver, in accordance the local plan policies meaning that the delivery of the spatial strategy is not at risk.</p> <p>PROMPT: Identify which sites are central to the delivery of your spatial strategy. Consider if there is evidence to suggest that lack of progress on these sites (individually or collectively) may prejudice the delivery of housing numbers, key infrastructure or other spatial priorities. Sites may be deemed to be key by virtue of their scale, location or type.</p>	Agree	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>The West Suffolk Housing Delivery Study (March 2019) identifies that past delivery has been stable and that recent shortfalls have been attributable to the global financial crisis. There is little evidence of planning permissions lapsing on larger sites in West Suffolk. This is consistent with national evidence that non-implementation is uncommon on larger sites outside major urban areas. While permissions on some smaller sites have lapsed, this remains comparatively rare and does not significantly affect the overall supply of new homes in the area.</p> <p>Officers undertake ongoing consultation and engagement with the development industry which will highlight any significant challenges to delivery arising from changes in the economic climate in light of Covid-19.</p>

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
A9.	<p>There have been no significant changes to the local environmental or heritage context which have implications for the local plan approach or policies.</p> <p>PROMPT: You may wish to review the indicators or monitoring associated with your Sustainability Appraisal (SA) / Strategic Environmental Assessment (SEA) / Habitats Regulations Assessment (HRA).</p> <p>Identify if there been any changes in Flood Risk Zones, including as a result of assessing the effects of climate change.</p> <p>Consider whether there have been any changes in air quality which has resulted in the designation of an Air Quality Management Area(s) or which would could result in a likely significant effect on a European designated site which could impact on the ability to deliver housing or employment allocations.</p> <p>Consider whether there have been any changes to Zones of Influence / Impact Risk Zones for European sites and Sites of Special Scientific Interest or new issues in relation to, for example, water quality.</p> <p>Consider whether there have been any new environmental or heritage designations which could impact on the delivery of housing or employment / jobs requirements / targets.</p> <p>Consider any relevant concerns being raised by statutory consultees in your area in relation to the determination of individual planning applications or planning appeals which may impact upon your plan - either now or in the future.</p>	Agree	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>There have been no significant changes to the local environment, although changes to the legal status of mitigation requiring appropriate assessment as a result of the 'People over Wind' ruling could impact on policy implementation. However, given the known constraints arising from the SPA prior to this ruling, there are no allocations affected. Policies within the JDMPD (DM10, DM11 and DM12) remain relevant, although the case law influences how they are interpreted.</p>

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
A10.	<p>There are no new sites that have become available since the finalisation of the adopted local plan which require the spatial strategy to be re-evaluated.</p> <p>PROMPT:</p> <p>Consider if there have been any new sites that have become available, particularly those within public ownership which, if they were to come forward for development, could have an impact on the spatial strategy or could result in loss of employment and would have a significant effect on the quality of place if no new use were found for them.</p> <p>Consider whether any sites which have now become available within your area or neighbouring areas could contribute towards meeting any previously identified unmet needs.</p>	Agree	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>No sites have come forward through the SHLAA, SHELAA or One Public Estate which would require re-evaluation of the strategy. USAF Mildenhall is scheduled for closure, but the date for that closure is currently unknown.</p>

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
A11.	<p>Key planned infrastructure projects critical to plan delivery are on track and have not stalled / failed and there are no new major infrastructure programmes with implications for the growth / spatial strategy set out in the plan.</p> <p>PROMPT: You may wish to review your Infrastructure Delivery Plan / Infrastructure Funding Statement, along with any periodic updates, the Capital and Investment programmes of your authority or infrastructure delivery partners and any other tool used to monitor and prioritise the need and delivery of infrastructure to support development.</p> <p>Check if there have been any delays in the delivery of critical infrastructure as a result of other processes such as for the Compulsory Purchase of necessary land.</p> <p>Identify whether any funding announcements or decisions have been made which materially impact upon the delivery of key planned infrastructure, and if so, will this impact upon the delivery of the Local Plan.</p>	Agree	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>Key infrastructure projects are detailed in the infrastructure delivery plan. Key infrastructure projects such as the Eastern Relief Road and improvements to Junction 45 of the A14 have been delivered, enabling development of the key employment site at Suffolk Business Park.</p>

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
A12.	<p>All policies in the plan are achievable and effective including for the purpose of decision-making.</p> <p>PROMPT: Consider if these are strategic policies or those, such as Development Management policies, which do not necessarily go to the heart of delivering the Plan’s strategy.</p> <p>Identify if there has been a significant increase in appeals that have been allowed and /or appeals related to a specific policy area that suggest a policy or policies should be reviewed.</p> <p>Consider whether there has been feedback from Development Management colleagues, members of the planning committee, or applicants that policies cannot be effectively applied and / or understood.</p>	Agree	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>A full analysis of policies has been carried out as detailed in the assessment of policy compliance for the two Core Strategies and the Joint Development Management Policies Local Plan Document. Where aspects of specific Core Strategy policies may not have been positively worded (Forest Heath CS1 and CS10), they form part of a complete suite of policies with Development Management policies (DM5 and DM27), which are collectively consistent with the Framework. This has been upheld at appeal: APP/H3510/W/19/3222167</p>

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
A13.	<p>There are no recent or forthcoming changes to another authority's development plan or planning context which would have a material impact on your plan / planning context for the area covered by your local plan.</p> <p>PROMPT: In making this assessment you may wish to:</p> <ul style="list-style-type: none"> ● Review emerging and adopted neighbouring authority development plans and their planning context. ● Review any emerging and adopted higher level strategic plans including, where relevant, mayoral/ combined authority Spatial Development Strategies e.g. The London Plan. ● Review any relevant neighbourhood plans ● Consider whether any of the matters highlighted in statements A1- A12 for their plan may impact on your plan - discuss this with the relevant authorities. ● Consider any key topic areas or requests that have arisen through Duty to Cooperate or strategic planning discussions with your neighbours or stakeholders - particularly relating to meeting future development and /or infrastructure needs. 	Agree	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>West Suffolk is proactive in cooperating with neighbouring authorities and monitoring and responding to their development plans as necessary. This work is particularly necessary in respect of highways and infrastructure and biodiversity impacts.</p> <p>There are no recent changes that that materially impact on the local plans.</p>

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
A14.	<p>There are no local political changes or a revised / new corporate strategy which would require a change to the approach set out in the current plan.</p> <p>PROMPT: In making this assessment you may wish to:</p> <ul style="list-style-type: none"> ● Review any manifesto commitments and review the corporate and business plan. ● Engage with your senior management team and undertake appropriate engagement with senior politicians in your authority. ● Consider other plans or strategies being produced across the Council or by partners which may impact on the appropriateness of your current plan and the strategy that underpins it, for instance, Growth Deals, economic growth plans, local industrial strategies produced by the Local Economic Partnership, housing/ regeneration strategies and so on. 	Agree	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>The former Forest Heath District and St Edmundsbury Borough merged in April 2019 to form the new West Suffolk authority. The new authority has continued the work of the previous authorities, adopting the final phases of the Forest Heath Local Plan (SIR and SALP). Work has now commenced in the preparation of a new West Suffolk Local Plan (Issues and Options).</p>

	ASSESSING WHETHER OR NOT TO UPDATE YOUR PLAN POLICIES	YES/NO (please indicate below)	
A15.	You AGREE with <u>all</u> of the statements above	Yes	<p>If no go to question A16.</p> <p>If yes, you have come to the end of the assessment. However, you must be confident that you are able to demonstrate and fully justify that your existing plan policies / planning position clearly meets the requirements in the statements above and that you have evidence to support your position.</p> <p>Based on the answers you have given above please provide clear explanation and justification in section A17 below of why you have concluded that an update is not necessary including references to evidence or data sources that you have referenced above. Remember you are required to publish the decision not to update your local plan policies. In reaching the conclusion that an update is not necessary the explanation and justification for your decision must be clear, intelligible and able to withstand scrutiny.</p>
A16.	You DISAGREE with one or more of the statements above and the issue can be addressed by an update of local plan policies		<p>If yes, based on the above provide a summary of the key reasons <u>why</u> an update to plan policies is necessary in section A17 below and complete Section B below.</p>
A17.	<p><u>Decision:</u> No need to update plan policies</p> <p>Reasons for decision on whether or not to update plan policies (clear evidence and justification will be required where a decision not to update has been reached):</p> <p>As detailed in response to questions A1 to A14 above and as justified in the assessment of policy compliance for the two Core Strategies and the Joint Development Management Policies Local Plan Document, the existing policies remain broadly consistent with the 2019 NPPF. Where aspects of individual policies in the Core Strategies may appear less than consistent with the Framework, they have been updated by policies in the Development Management Local Plan Document such that collectively they are fully compliant with the Framework.</p>		

	<p>Other actions that may be required in addition to or in place of an update of plan policies</p> <p>Although an update of existing policies is not deemed necessary, given the change in status of the authority referred to in response to A14 above, it is considered appropriate to prepare an entirely new Local Plan for the new West Suffolk Council. Preparation is already under way in respect of the Issues and Options stage of the West Suffolk Local Plan.</p>		
	B. POLICY UPDATE FACTORS	YES/NO (please indicate below)	Provide details explaining your answer in the context of your plan / local authority area
B1	Your policies update is likely to lead to a material change in the housing requirement which in turn has implications for other plan requirements / the overall evidence base.		
B2	The growth strategy and / or spatial distribution of growth set out in the current plan is not fit for purpose and your policies update is likely to involve a change to this.		
B3	Your policies update is likely to affect more than a single strategic site or one or more strategic policies that will have consequential impacts on other policies of the plan.		
	You have answered yes to one or more questions above.		You are likely to need to undertake a full update of your spatial strategy and strategic policies (and potentially non-strategic policies). Use your responses above to complete Section B4.
	You have said no to <u>all</u> questions (B1 to B3) above		If you are confident that the update can be undertaken without impacting on your spatial strategy and other elements of the Plan, you are likely to only need to undertake a partial update of policies. Complete Section B4 to indicate the specific parts / policies of the plan that are likely to require updating based on the answers you have given above.

B4	<p>Decision: Full Update of Plan Policies/ Partial Update of Plan Policies (delete as necessary)</p> <p>Reasons for scope of review:</p>
-----------	--

Date of assessment:	30 April 2020
Assessed by:	Chris Rand/Ann-Marie Howell
Checked by:	Marie Smith
Comments:	