

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 Completing the matrix will help you understand which policies may be out of date for the purposes of decision making or where circumstances may have changed and whether or not the policy / policies in the plan continue to be effective in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](#), [PPG](#), Written Ministerial Statements and the [National Model Design Code](#). 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, any local design guides or codes 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.

Plan:MK and Site Allocations DPD

	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, PPG, Written Ministerial Statements and the National Model Design Code (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>The overwhelming majority of policies within Plan:MK still reflect national planning policy requirements. Policies with the SAP reflect the current NPPF. The Council can also currently demonstrate a 5-year Housing Land Supply and performs well against the Housing Delivery Test. It is noted that the housing requirement figure used for calculating land supply will increase to 1,902 dwellings pa from April 2024. However, the Council at this point in time is confident it will be able to maintain its 5-year year housing land supply position on this basis, and will publish an updated position alongside the Regulation 18 consultation on the New City Plan. Recent appeal decision indicates that Plan:MK is not rendered out of date by virtue of policy DSO in Plan:MK (policy requiring submission of a new Local Plan by 2022) as the circumstances surrounding the purpose of policy DSO have changed markedly since it was adopted in 2019.</p> <p>There are limited aspects of Plan:MK which do not fully reflect national planning policy, however, there are mitigating circumstances and they are considered to be minor and do not warrant a full review of Plan:MK for those reasons:</p> <ul style="list-style-type: none"> - NPPF para 16e: Plan:MK is digitally available in PDF format, and its Policies Maps via an interactive GIS platform, however it could be argued its overall digital accessibility is limited compared to indications from government as to what this means in practice. - NPPF para 22: Plan:MK has a plan period of 15 years (2016-2031) but only 12 years from point of adoption which is out of step with para 22. However, strategic policies and allocation within Plan:MK for provision of growth extend beyond 2031 and provide a strategic vision and framework to guide this growth beyond 2031, complemented by adopted Supplementary Planning Documents for

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			<p>strategic allocation (and in certain cases outline planning permission).</p> <ul style="list-style-type: none"> - NPPF para 67: Plan:MK does not set out figures for neighbourhood plans, but is clear regarding the strategy for growth in rural areas is to be determined through neighbourhood plans. Standing advice from the council is that communities should plan for a minimum of 1 dwelling if they are preparing a neighbourhood plan. - NPPF Para 85-87 and 90-95: changes to use class order and Permitted Development have impacted on the effectiveness of Plan:MK in protecting existing retail and employment uses from change of use. However, this does not render decision-making ineffective as changes to land use classifications and permitted development are material considerations that can be drawn into decision-making as appropriate on a case by case basis. - NPPF para 98: Plan:MK does this in a general sense, but due to the lack of certainty around the regeneration strategy at the time of preparing Plan:MK (and since), it does not set out specific policies guiding estate regeneration. The position on regeneration in MK has not changed substantially since adoption of Plan:MK to warrant a review on these grounds. - NPPF para 113: Plan:MK does not allocate or designate lorry parking sites and facilities, but policies within the plan enable the planning of them to be brought forward using relevant criteria-based approaches. - NPPF 125-129: Plan:MK does this using a flexible approach to density and density ranges for CMK and Bletchley, complemented by design policies. Whilst it does not specifically refer to beauty, Plan:MK is in conformity with NPPF policy on this. - Written Ministerial Statement on Affordable Homes Update (24 May 2021) which contains policy on First Homes: Policy HN2 does not reflect the need to plan for the provision of First Homes. However, the Council has published a Position Statement on how HN2 should be interpreted and applied in the context of WMS 2021 which mitigates as the need to formally review Policy HN2. - NPPF para 67: Plan:MK does not set out figures for neighbourhood plans, but is clear regarding the strategy for growth in rural areas is to be determined through neighbourhood plans. Standing advice from

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			the council is that communities should plan for a minimum of 1 dwelling if they are preparing a neighbourhood plan.
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>Plan:MK, the current local plan, identifies the annual housing need requirement as 1,766 homes per annum. The Housing and Economic Development Needs Assessment prepared to support the New City Plan includes updated housing need figures for the period 2022-2050 of 1,902 homes per annum as per the standard method. However, this uplift is not considered to represent a significant change (c. 7.6% increase) relative to how housing needs in other parts of the region have changed with the introduction of the standard method and LHN approach.</p>

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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>The Council can currently demonstrate a 5-year housing land supply.</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>Under the Housing Delivery Test, Milton Keynes has consistently met its targets and delivered in excess of 100% (133% in 2022 as the latest figures). Delivery in 2021/22 and 2022/23 has been above target, 2,005 and 3,093 respectively.</p>
A5.	<p>Your plan policies are on track to deliver other plan objectives including any (i) affordable housing targets including requirements for First Homes; 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>Whilst delivery of affordable housing since Plan:MK was adopted in 2019 has been below the 31% target, delivery rates have been increasing to a current level of 29% for the first three quarters of 2023/24. This indicates that the influence of Plan:MK is beginning to grow and to have a positive impact on the delivery of affordable housing. This is to be expected considering the typical 'lag' between plans being adopted and materially affecting the development that is being delivered. This trend indicates that there isn't a need to review Plan:MK on these grounds alone. Milton Keynes continues to outperform comparator cities and boroughs in the southeast in terms of productivity and economic activity overall, with provision of floorspace and job creation in line with policies contained within Plan:MK.</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>Unforeseen events (for example the Covid-19 Pandemic) are impacting upon the delivery of the plan.</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>Whilst there have been significant changes in economic conditions, (particularly the pandemic, inflationary pressures and hikes in interest rates) since the adoption of Plan:MK and the SAP, these have not impacted on the key measure of performance for Plan:MK and the SAP, namely the delivery of housing. As noted above housing delivery since the adoption of Plan:MK has continued to improve through to the last full monitoring year 2022/23 where record rates of delivery were seen. So far there have been circa 1,800 completions for the first three quarters of 2023/24, meaning we are set to exceeding our monitoring target. Starts reached a peak of 3,017 in 2022/23, and whilst these have dipped in 2023/24 so far due to the mortgage rates quickly rising at the end of 2022/early 2023, it is unknown how at this time how long starts will remain suppressed due to acute changes in the economic climate. Similarly, the number of major applications has reduced over the last 12 months, but it is unknown whether this will be a temporary state following the immediate impact of the 2022 mini-budget.</p> <p>Despite economic headwinds, Milton Keynes continues to outperform comparator cities and boroughs in the southeast in terms of productivity and economic activity overall, in line with expectations at the time Plan:MK was prepared and adopted.</p> <p>Overall, whilst changes in economic conditions have been challenging, they have not yet (and may not) translate into long terms fundamental challenges to the delivery of Plan:MK and SAP objectives around housing delivery and supporting economic growth.</p>

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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>The current period of high inflation has increased construction costs but the authority is not seeing new repeated viability challenges across all development typologies.</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 in addition to the role that may have in delivering any associated infrastructure.</p>	Agree	<p>Milton Keynes East has progressed well, has outline permission and construction of enabling infrastructure is underway, so it is expecting this allocation will continue as planned. Whilst there have been delays in progressing South East MK since the adoption of Plan:MK and the associated Development Framework SPD, notably due to uncertainty created by East West Rail, applications have been submitted for the bulk of the allocation and further applications for the remainder of the allocation are anticipated. Other sites in the plan have generally progressed well. Overall delivery of the spatial strategy is not at risk.</p> <p>Of the 15 sites allocated in the SAP, 9 have been delivered or have planning permission. No impediments have been identified for the delivery of the remaining sites, with them being in Council ownership, directly or via MKDP.</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 have 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>Preparation for the New City Plan is creating an updated evidence base which has given rise to changes to some of the local environment and heritage context. A notable change has been the designation of revised flood zone maps. However, while these maps will be a material consideration in decision making, and it is not considered that it will significantly alter the approach/policies within Plan:MK.</p>

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
A10.	<p>No new sites 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	No new sites have emerged that are at odds with the adopted spatial strategy in Plan:MK or the approach taken in the SAP.

	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>Delays to East West Rail, and uncertainty created by this, has slowed delivery of the South East MK allocation, but applications have been made for most of this allocation and it is expected to proceed broadly in line with Plan:MK.</p> <p>No new infrastructure projects have emerged (outside of work on the New City Plan, namely Mass Rapid Transit Business Cases) that create implications for Plan:MK.</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>	Disagree	<p>As noted in Part 2 of the Toolkit, the vast majority of policies in Plan:MK (and all policies of the SAP) are considered to be effective for decision making. Policies impacted by changes in national policy are limited to Policy HN2 (due to new First Homes requirements) and policies that protect existing retail and employment uses from change of use. However, this does not render decision-making ineffective as changes to land use classifications and permitted development are material considerations that can be drawn into decision-making as appropriate on a case-by-case basis.</p> <p>No systemic issues with policies or groups of policies have been identified through appeal decisions. Feedback from Development Management and Planning Committee has aided interpretation of policies on a consistent basis since adoption of Plan:MK, with additional position statements and guidance provided as necessary. Preparation of the New City Plan will factor this feedback into the preparation of new and revised policies for the new local plan.</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.	None

	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>None. The Strategy for 2050 has been adopted as expected when preparing Plan:MK (see Policy DS0) but this alone does to warrant an immediate review and submission of a new local plan by 2022 as Policy DS0 indicated. Nonetheless, the New City Plan is being prepared for submission in 2025 to enable delivery of the Strategy for 2050.</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	Yes	<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>Decision: A review of either Plan:MK or the SAP is not required on the basis that they are both still able to achieve their respective objectives. Plan:MK and the SAP continue to delivery growth as planned and remain functional plan for decision-making. Nonetheless, a review of Plan:MK and preparation of the New City Plan has already commenced which will effectively replace both Plan:MK and the SAP</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 have said no to <u>all</u> questions (B1 to B3) above		
B4			

Date of assessment:	16 February 2024
Assessed by:	Andrew Turner

Checked by:	
Comments:	