

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 Completing the matrix will help you understand which policies may be out of date for the purposes of decision making or where circumstances may have changed and whether or not the policy / policies in the plan continue to be effective in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.

Waste Development Plan Document 2008

	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>	Disagree	<p>Paragraph 2 of the National Planning Policy for Waste (NPPW) in-part requires that waste planning authorities should ensure that the planned provision of new [waste management] capacity and its spatial distribution is based on robust analysis of best available data and information, and an appraisal of options. The data upon which the Waste DPD (2008) is based is several years old and there is more recent data available, which has been prepared to support the New City Plan. Therefore, an opportunity exists to review the Waste DPD considering this new evidence.</p> <p>Paragraph 3 of the NPPW in-part states there is a need to identify the future tonnages and percentages of municipal, and commercial and industrial, waste requiring different types of management over the period of the plan. As explained in the answer to part A2, the volume of waste arisings has evolved differently to expectations in 2008 and so there is a need to review how the needs for waste management facilities have changed.</p> <p>Paragraph 3 of the NPPW also states that in preparing Local Plans, waste planning authorities should drive waste management up the waste hierarchy, recognising the need for a mix of types and scale of facilities, and that adequate provision must be made for waste disposal. Since adoption of the Waste DPD, changes to legislation and Government policy, such as increases in landfill tax and emerging emissions trading charges, have acted to drive waste further up the waste hierarchy. We must therefore review the future implications of this for the types and capacities of different waste management facilities needed in Milton Keynes.</p>

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
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>	Disagree	<p>The Waste DPD in 2008 was premised on a projected population growth of up to 306k people in 2020/21 and 327k people by 2024/25. The population of MK in 2021 stood at 287k, considerably lower than projections made in 2008 upon which the Waste DPD was prepared and adopted. Similarly the volume and mix of waste arisings has evolved differently to how it was expected in 2008, with more waste being managed higher up the waste management hierarchy resulting less waste going to landfill. This has resulted in the lifespan of the Bletchley Landfill site being extended (through appeal decision APP/Y0435/W/21/3271410) in light of it taking longer to fill at current rates. Whilst circumstances have changed around population growth and waste arisings, resulting in a different set of challenges to those anticipated in the Waste DPD when it was prepared, the Waste DPD is still effective in delivering upon its overall objectives to manage waste in accordance with the waste hierarchy, taking into account the wider regional waste planning picture. Nonetheless, anticipated future growth is set to bring the population of Milton Keynes to 410,000 people by 2050, therefore there is a need to review the Waste DPD so it is able to respond to and manage waste arisings linked to future growth beyond 2026, which is the period covered by it.</p>
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>	n/a	n/a

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
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>	n/a	n/a
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>	n/a	n/a

	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>	Disagree	<p>As noted above, the Waste DPD has set out a policy framework for the planning of waste to enable appropriate waste management within Milton Keynes and the wider region as appropriate, noting that waste planning and management occurs at a both a local and regional scale. Whilst there have been shifts in economic conditions since the Waste DPD was adopted in 2008, these have not undermined to ability of the plan to deliver its objectives. Nonetheless, anticipated future growth is set to bring the population of Milton Keynes to 410,000 people by 2050, therefore there is a need to review the Waste DPD so it is able to respond to and manage waste arisings linked to future growth beyond 2026, which is the period covered by it.</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>	n/a	n/a
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	The principal allocations in the Waste DPD were for a Strategic Waste Management Sites in Wolverton and Bletchley, and safeguarding of existing waste management sites in Milton Keynes. These allocations have been successfully delivered and continue to play their anticipated role in managing waste for Milton Keynes and the wider region as planned.

	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, it is not considered that it will significantly alter the policies contained in the Waste DPD, or the wider Development Plan as appropriate, that are particular to waste development.</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

	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	n/a

	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, most policies in the Waste DPD are effective for decision making. However, it is considered that Policy WCS1 (capacity requirements) needs updating on the basis that the population of Milton Keynes has increased at a lower rate than expected relative to projections at the time of preparing the plan. Moreover, Policy WA1 is superfluous to decision making on the basis that the Milton Keynes Waste Recovery Park has now been delivered at the Old Wolverton Colts Holm Road site.</p> <p>No systemic issues with policies or groups of policies have been identified through appeal decisions.</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	None.

	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	No	<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 is required as the plan is approaching the end of its plan period, and the general circumstances are growth and waste arisings will be different for the post-2026 period. The NPPW highlights instances where the Waste DPD policies need to be updated. A review of the Waste DPD is need in the context of a New City Plan (currently being prepared) and the NPPW.</p>		
	B. POLICY UPDATE FACTORS	YES/NO (please indicate)	Provide details explaining your answer in the context of your plan / local authority area

		below)	
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.	Yes	An update to the Waste DPD will not materially change housing requirements, but in reverse the new and ongoing requirement for housing post-2026 requires an update of waste needs evidence and corresponding policies to manage waste in accordance with updated national waste planning policy.
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.	No	The current strategy for planning waste contained in the Waste DPD is still effective but need to be cognisant of future growth beyond 2026.
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.	Yes	The update could potential indicate the need for new strategic sites or revisions to strategic policies in the current Waste DPD.
	You have answered yes to one or more questions above.	Yes	
	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:	