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 Completing the matrix will help you understand which policies may be out of date for the purposes of decision making or where circumstances may have changed and whether or not the policy / policies in the plan continue to be effective in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 <u>Planning and Compulsory Purchase Act 2004 (as amended)</u>; <u>The Town and Country Planning (Local Planning) (England)</u>

Regulations 2012 (as amended) and the most up to date <u>NPPF</u>, <u>PPG</u>, Written Ministerial Statements and the <u>National Model Design Code</u>. 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 <u>NPPF</u>. 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.

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
Α	PLAN REVIEW FACTORS		
A1.	The plan policies still reflect current national planning policy requirements. 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).	Disagree	Reason (with reference to plan policies, sections and relevant evidence): The Plan mostly still reflects national planning policy requirements. However, there are several areas where the Plan does not conform with national policy. These are as follows. The Council cannot currently demonstrate a 7-year landbank of permitted sand and gravel sites, which does not conform with NPPF Paras 15, 17, 20, 23, 85, 86, 126, 216 and 219. Re. NPPF Para 16, the current plan is not accessible using digital tools. With respect to NPPF Paras 5 and 6, a minor point is that there is a need to update the plan with MK's now city status. In terms of Para 21, the Plan does not explicitly state which policies are "strategic" and "non-strategic". Re. Para 34, the possible need for planning obligations is mentioned in the current plan. There is uncertainty around this point as we would not automatically seek an obligation for minerals development. Detailed evidence on viability in relation to obligations therefore may not be required. Re. Paras 61 and 75, new housing need numbers from the HEDNA will need to be considered and may affect the Aggregate Provision Rate. Re. Para 158, there is a gap in Policy 15 around measures to protect water supply, which may be affected by minerals development; the current plan also does not consider the resilience of minerals related development during both the operational and aftercare phases of development. Re. Para 160, the Plan currently does not consider the opportunities for development to draw its energy supply from decentralised, renewable, or low carbon energy supply. Re. Para 173, current policies do not explicitly address flood risk management during the extraction phase of a site; although, this is covered by policies in Plan:MK. Re. Para 180, Policies 9 and 11 and their supporting texts address the enhancement of the local environment. However, there is a need to explicitly refer to sites of geological value, recognising the intrinsic character and beauty of the countryside, and the wider be

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
A2.	There has not been a significant change in local housing need numbers from that specified in your plan (accepting there will be some degree of flux). 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). 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.	Agree	Reason (with reference to plan policies, sections and relevant evidence sources): 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. Notwithstanding the relatively minor nature of the uplift, the increase in housing need would be a factor to consider when deciding on an appropriate APR in the MLP.
АЗ.	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	Agree	Reason (with reference to plan policies, sections and relevant evidence sources): The Council can currently demonstrate a 5-year housing land supply; it is not considered that this has implications for the MLP.

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
A4.	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.	N/A	This is not relevant to the MLP.
A5.	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. PROMPT: Use (or update) your Authority Monitoring Report to assess delivery.	Disagree	The council cannot currently demonstrate a 7-year landbank of sand and gravel sites, as demonstrated in our draft Local Aggregates Assessment (2023). Therefore, Strategic Objectives (SO) 1 and 2 are currently not on track. While four sites for sand and gravel extraction are identified in the MLP, two of these are not coming forward. The plan anticipates these would come forward from 2023 onwards, but we have not received any requests for preliminary discussions, at the least. There is therefore a need to explore what is preventing these sites coming forward. Notwithstanding the above, it is considered that SOs 3-10 are on track.

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
	There have been no significant changes in economic conditions which could challenge the delivery of the Plan, including the policy requirements within it.	Disagree	Reason (with reference to plan policies, sections and relevant evidence sources): A period of high inflation is affecting the development industry, and in 2022
A6.	PROMPT: A key employer has shut down or relocated out of the area.	_	A period of high inflation is affecting the development industry, and in 2023 the Mineral Products Association has reported sharp falls in sales of readymixed concrete, sand and gravel, and mortar related to a slowdown in housebuilding and delays to key infrastructure projects ¹ . With some forecasts
	Unforeseen events (for example the Covid-19 Pandemic) are impacting upon the delivery of the plan.		that construction rates are unlikely to pick up again until 2025, it is likely the current economic climate will continue to impact demand for aggregates in the short to medium term. This may have implications for the delivery of new
	Up-to-date evidence suggests that jobs growth is likely to be significantly more or less than is currently being planned for.		sites, and therefore the landbank, in the short to medium term, but it is not expected this will affect longer term growth forecasts for Milton Keynes. These matters may be behind current non-delivery of the remaining allocated sites,
	Consider if there is any evidence suggesting that large employment allocations will no longer be required or are no longer likely to be delivered.		but further investigation is needed. Investigation of the potential implications for the Aggregate Provision Rate is also needed.
	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.		
	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.		

¹ https://mineralproducts.org/News/2023/release32.aspx

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
	There have been no significant changes affecting viability of planned development.	Disagree	Reason (with reference to plan policies, sections and relevant evidence sources):
A7.	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. Consider evidence from recent planning decisions and appeal decisions to determine whether planning policy requirements, including affordable housing, are generally deliverable. Ongoing consultation and engagement with the development industry may highlight any significant challenges to delivery arising from changes in the economic climate.	-	The current period of high inflation is likely to affect the viability of minerals extraction and minerals related development in Milton Keynes, however, the true extent of this and the costs involved are unknown.
A8.	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. 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.	Disagree	Reason (with reference to plan policies, sections and relevant evidence sources): Our experience of assessing Allocated Sites A1(Calverton/Passenham extension) and A3 (Northampton Road, Lathbury), minerals development is being delivered in line with other policies within the Plan. However, as noted above, allocated (and unallocated) sites aren't coming forwards at a fast enough rate to maintain the 7-year landbank requirement for sand and gravel, as set out in the NPPF. Sites A2 (Quarry Hall Farm) and A4 (Manor Farm and Lavendon Mill) as allocated in Policy 3 of the MLP are expected to come forwards from 2023 onwards, however, as of November 2023, we have not received any word from the landowners regarding their intentions for these sites. We have recently received a proposal for additional extraction, including on land outside the original allocation at Site A3. This raises a question over the deliverability of the current spatial strategy.

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
	There have been no significant changes to the local environmental or heritage context which have implications for the local plan approach or policies.	Agree	Reason (with reference to plan policies, sections and relevant evidence sources):
А9.	policies. PROMPT: You may wish to review the indicators or monitoring associated with your Sustainability Appraisal (SA) / Strategic Environmental Assessment (SEA) / Habitats Regulations Assessment (HRA). Identify if there have been any changes in Flood Risk Zones, including as a result of assessing the effects of climate change. 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. 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. Consider whether there have been any new environmental or heritage designations which could impact on the delivery of housing or employment / jobs requirements / targets. 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.		Preparation for the New City Plan is creating an updated evidence base which has given rise to changes to 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 approach/policies within the MLP, which address flood risk management, in conjunction with Policies set out in Plan:MK. The Nature Green and Blue Infrastructure Study introduces potential design standards for green and blue infrastructure, which could be applied to the restoration and aftercare plans secured within new minerals extraction permissions. However, these recommendations are not yet policy and so it is not considered they would be afforded any weight when considering new applications and/or conflict with Policy 16 in the MLP.

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
	No new sites have become available since the finalisation of the adopted local plan which require the spatial strategy to be re-evaluated.	Agree	Reason (with reference to plan policies, sections and relevant evidence sources):
A10.	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. Consider whether any sites which have now become available within your area or neighbouring areas could contribute towards meeting any previously identified unmet needs.	-	An unallocated sand and gravel site recently came forward for development within application 23/02241/MIN. However, the site proposed is within a Minerals Primary Focus Area and is adjacent to allocated Site A3. In principle, the site is in an area we would expect a sand and gravel extraction operation to take place, as per Policy 2 in Plan:MK, subject to all other policies being met. Therefore, it is not considered necessary to re-evaluate the spatial strategy applied to minerals development based on this unallocated site coming forward.

and have not stalled / failed and there are no new major infrastructure programmes with implications for the growth / spatial strategy set out in	h reference to plan policies, sections and relevant evidence
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. Check if there have been any delays in the delivery of critical infrastructure Council's aim not compron station. The delivery of into Milton K economic actions the delivery of critical infrastructure Council's aim not compron station. The delivery of into Milton K economic actions the delivery of critical infrastructure	ith respect to safeguarding, it will be important to ensure that the n of creating an eastern entrance to Bletchley railway station does mise continued operation of the Cemex rail depot adjacent to the depot receives a significant proportion of aggregates imported Keynes, and its significance for maintaining construction-related civity in the area should not be underestimated. Policy 19 in the ards continued operation of the depot. An updated MLP would tinue to safeguard this site, in line with Para 216 e of the NPPF.

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
	All policies in the plan are achievable and effective including for the purpose of decision-making.	Disagree	Reason (with reference to plan policies, sections and relevant evidence sources):
A12.	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. 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. 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.	-	It is considered that most policies within the plan are achievable and effective for the purposes of decision making. There have been no reports of issues relating to an increase in successful appeals, feedback from DM colleagues, members of planning committee, or applicants that policies cannot be effectively applied and/or understood. However, from a strategic and Local Aggregates Assessment perspective, there are questions over the achievability of Policy 3 (site specific allocations), which is intended to allocate sufficient sites to meet local aggregate needs, given the absence of a 7-year landbank for sand and gravel.

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
	There are no recent or forthcoming changes to another authority's	Agree.	Reason (with reference to plan policies, sections and relevant evidence
	development plan or planning context which would have a material		sources):
	impact on your plan / planning context for the area covered by your local		
	plan.		We are not aware of any changes to development plans/the planning context in other authority areas which would have an impact on local aggregate
	PROMPT:		provision. Through our Duty to Cooperate responsibilities and work within
	In making this assessment you may wish to:		SEEAWP, we have not identified any matters which would have implications
	Review emerging and adopted neighbouring authority development plans and their planning context.		for implementation of the MLP. Similarly, we ask respondents to our annual aggregate monitoring survey to highlight if there are any issues which may
A13.	Review any emerging and adopted higher level strategic plans including, where relevant, mayoral/ combined authority Spatial Development Strategies e.g. The London Plan.		constrain the future supply of minerals to MK. Survey returns have not highlighted any such issues.
	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. 		

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
	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.	Agree	Reason (with reference to plan policies, sections and relevant evidence sources):
A14.	 PROMPT: In making this assessment you may wish to: 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. 	-	In 2022 an updated Council Plan for the period 2022-2026 was published, and in May 2023 an updated Council Plan Delivery Plan for 2023-24 was published. Neither Plan mentions minerals development and as such the implications of the documents for the MLP are limited. They do however mention the need to support measures to increase biodiversity and broadly to promote sustainable transport, provide high quality green spaces, and achieve sustainable development and mitigate climate change, which the current MLP contains policies on. It is not considered that the Council Plan/Delivery Plan introduces a need to change the approach set out in the MLP.

	ASSESSING WHETHER OR NOT TO UPDATE YOUR PLAN POLICIES	YES/NO (please indicate below)	
A15.	You AGREE with all of the statements above	NO	If no go to question A16. 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. 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.
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	If yes, based on the above provide a summary of the key reasons why an update to plan policies is necessary in section A17 below and complete Section B below.
A17.	Decision: Update plan policies As noted above and in response to the questions in Part 2 of the Toolkit, there is a need to carry out a full review and update of the MLP. The overarching need to do so is because the council cannot currently demonstrate a 7-year sand and gravel landbank. There are questions over the deliverability of the remaining sand and gravel allocations in the Plan. Preliminary review at this stage also identifies a need to update the plan to ensure conformity with the NPPF, with respect to use of digital tools, MK's now city status, stating which policies are "strategic" and "non-strategic", whether further evidence around viability of planning obligations is required, the impact of new housing need numbers on the Aggregate Provision Rate, measures to protect water supply, the resilience (to climate change) of minerals related development during both the operational and aftercare phases of development, the opportunities for development to draw its energy supply from decentralised, renewable, or low carbon energy supply,		

		from natura	ed to explicitly refer to sites of geological value, recognising the intrinsic I capital, and recognising that some noisy short-term activities, which may Is extraction.
	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.	NO	It is typically the case that the MLP Aggregate Provision Rate will be informed by housing numbers, rather than the other way around.
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	Minerals can only be worked where they are found, and all the available evidence indicates that mineral resources in MK are found in the Primary and Secondary Focus areas identified in the MLP. While the update may involve the allocation of additional sites, it is unlikely that these will result in a change to the overarching spatial strategy currently outlined in Policy 2 of the MLP (of Primary and Secondary Focus areas.
В3	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.	No	It is not considered that changes to site allocations would have knock on impacts for more detailed policies in the plan, as the steer from the NPPF is that detailed planning requirements would apply to all minerals sites regardless of location.
	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.
В4	Decision: Partial Update of Plan Policies		
	Reasons for scope of review:		

Minerals can only be worked where they are found, and all the available evidence indicates that mineral resources in MK are found in the Primary and Secondary Focus areas identified in the MLP. While the update may involve the allocation of additional sites, it is unlikely that these will result in a change to the overarching spatial strategy currently outlined in Policy 2 of the MLP (of Primary and Secondary Focus areas). It is also not considered that changes to site allocations would have knock on impacts for more detailed policies in the plan, as the steer from the NPPF is that detailed planning requirements would apply to all minerals sites regardless of location.

However, as noted above, there is a need to update several policies considering new requirements in the NPPF since adoption of the MLP in 2017. Therefore, including assessment of the need for additional allocations (over and above those set out in Policy 3), it is considered we should review and partially update the following policies:

- Policy 1 (Providing for sand and gravel)
- Policy 5 (Development principles for mineral extraction)
- Policy 9 (Natural assets and resources)
- Policy 11 (Landscape and townscape character)
- Policy 12 (General amenity)
- Policy 14 (Site design and layout)
- Policy 15 (Addressing climate change)
- Policy 16 (Restoration and after-use)
- Policy 17 (Implementation)

If evidence prepared or information submitted to us by interested parties during review of these policies also indicates that other policies in the current MLP should be updated, we will update other policies as appropriate.

Date of assessment:	14 November 2023 (reviewed considering new NPPF on 5 January 2024)
Assessed by:	Luke Gledhill
Checked by:	
Comments:	