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 Completing the matrix will help you understand which policies may be out of date for the purposes of decision making or where circumstances may have changed and whether or not the policy / policies in the plan continue to be effective in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</u> (as amended); <u>The Town and Country Planning (Local Planning)</u> (England) 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 <u>Part 2 of the toolkit</u> 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 <u>Part 2 of the toolkit</u> 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): S1 and S2 Local Plan meets most NPPF requirements as it was written and examined to comply with the NPPF 2012, any areas which remain unamended including policies relating to the countryside, plan content and communications will not require updating. Some national policies have been updated and are therefore not fully reflected including policies on Housing, Design, Biodiversity, Town Centres and Transport. Any updates to the NPPF, NPGG, WMS, NDG and NMDC will need to be considered for inclusion in the review. The adopted Local Plan will be revised to ensure that it fully NPPF compliant.

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).

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.

Disagree

Reason (with reference to plan policies, sections and relevant evidence sources):

The Local Plan sets a requirement of 716 dwellings per annum. In the past few years, the Government's Standard Method for calculating housing need has required a number of dwellings per annum within the range of 814 - 870.

In 2024, the figure is 814 dwellings per annum. However a current government consultation on the NPPF, if approved, would likely significantly increase this figure to nearly 1100 dwellings per annum.

Supply in the Local Plan delivers approximately 1,000 dwellings per annum over the Plan period 2021-2024 but this is a peak and is likely to be lower 2024/25.

Currently based on the current NPPF (2023), we estimate that the housing need, having accounted for a small degree of flux, will remain unchanged and the number of dwellings per annum is likely to be around 800 (NPPF 2024 Review notwithstanding). The Council is extending the plan period to 2041 and reviewing the housing allocation strategy in response to market capacity, new strategic infrastructure and any emerging central government growth strategies.

The overall housing need, including size, type and tenure of housing needed for different groups in the community will be reviewed in a revised strategic housing market assessment (SHMA).

A2.

A3.	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 Braintree 5 Year Land Supply (5YHLS) position statement (April 2023 based)_shows the Council can demonstrate 5.49 years of supply. The statement, provided with appeal evidence, provides further supporting information. A position statement will be issued shortly.
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.	Agree	Braintree Council is meeting the requirements of the Housing Delivery Test (HDT) so there is no need to undertake an action plan based on HDT measurement rulebook as published in Dec 2023. Residential sites of 500 or less are generally delivering in accordance with the trajectory and timeframes. Some strategic sites are not delivering according to the trajectory. In the last three years, the Council has covered about 80% of the historic shortfall that had accumulated from 2013 to 2021, and is on target to fully make up the shortfall within the 5 year period tested at the Local Plan Examination We will keep this under review annually, alongside the Housing Delivery Test. The 2021/22 figure (published in Dec 2023) shows that Braintree exceeded the Housing Delivery Test threshold by 52%.
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)	Disagree	The Annual Monitoring Report (The AMR) shows affordable housing and employment targets are generally being met.

	commercial floorspace/jobs targets over the remaining plan period. PROMPT: Use (or update) your Authority Monitoring Report to assess delivery.		The Local Plan does not set a target for affordable housing however the November 2016 Objectively Assessed Need study defined the annual affordable housing need at 212 dwellings per year. The projected supply of affordable housing over the 5-year period 2022-2027 from sites within the 5-year supply trajectory is a total of 1,426 which is an annual average of 285 dwellings. The current Local Plan policies does not include the requirement for First Homes. The percentage of affordable housing was set in 2015 and viability conditions may have changed since then. However, it should be noted that for the majority of applications the required percentage of affordable housing is being met. The Local Plan sets a target for employment growth in hectares
			this is published as a range of 20.9ha and 43.4ha. Against this employment target, 25.3ha is complete, under construction or has planning permission. A new employment land study is being commissioned which will provide data on the progress of jobs growth against projected jobs growth forecasts.
	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):
A6.	PROMPT: A key employer has shut down or relocated out of the area. Unforeseen events (for example the Covid-19 Pandemic) are impacting upon the delivery of the plan.		An Employment Land Review has been commissioned to look at the macro economic effects of covid, working-from-home, energy prices, inflation, leaving the EU and AI, among other things, on the local economy. We will require new jobs-based forecasting from Cambridge econometrics and adjust for the above events and also account for additional new housing growth.

Up-to-date evidence suggests that jobs growth is likely to be significantly more or less than is currently being planned for.

Consider if there is any evidence suggesting that large employment allocations will no longer be required or are no longer likely to be delivered.

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.

Despite these economic shocks and uncertain future, the Council have observed that occupation of employment land and retail has remained relatively robust with a low number of vacancies or voids. Our 2019 Retail review confirms that comparison and convenience retail growth is likely to remain anaemic in our town centres. In light of this, our town centres will need to adapt to the changing demands and needs of customers by transitioning to an experience economy including continued growth in the food and drink sector.

For Local Plan allocations, all employment locations suitable for units of 10,000sqm and above have planning permitted or have been developed (possibly except for Bluebridge Halstead). These sites have delivered early in response to a sharp increase in demand for logistics space during covid. Our remaining employment land is capable of accommodating startup, grow-on and small to medium sized units.

The remaining smaller employment allocations of between 1 and 4 hectares have not had any site work started. This is partly because 4 out of 6 allocations are codependent on their host Strategic (housing) Allocation which have not delivered as predicted, as discussed at Question A8. Some landowners have also pushed for a reduction at pre-application stage citing a lack of commercial viability for small to medium sized units post covid.

For Local Plan retail allocations, only the Council led scheme at Land at Manor Street/Victoria Street has completed. Due to a lack of interest from respective landowners, there has been no progress on Land at Sainsburys, Land at Tesco, New Street, Braintree or Land at Newlands Street, Witham.

			The employment evidence review will explore if any poorly performing employment sites should be deallocated.
	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 viability of the revised Local Plan policies will all need to be reviewed but it does appear that inflation is returning towards the Bank of England target rate of 2% after a period of high inflation primarily driven by a spike in energy costs. Secondary factors contributing to inflation includes increased materials costs following Covid. Neither of these two factors are likely to be abnormal in the longer term inflationary trend. BCIS materials index appears to have tracked significant increases since 2017 (average annual % increase of 6%) however the data available on their website is insufficient to calculate the increase. https://bcis.co.uk/insight/index-bcis-house-rebuilding-cost-index/ The Council understands that materials costs for building and infrastructure will have increased significantly with the data showing higher levels of inflation than was forecast in 2017. As costs have changed significantly, planned infrastructure and viability will need reviewing. Despite maintaining a good supply of new affordable homes, overall affordable housing supply is not keeping up with demand and there is a chronic undersupply of three and four bedroom affordable homes for rent. The quantum, type and tenure of

			housing needs assess assessment and infralatter will also reflect deliver the plan. Otherwise, affordable as expected and plan not deliverable. The need to introduce Change has become reincorporated into the viability calculation needs.	e design to mitigate ar more urgent, and more design of new develo eeds to take into cons g to the need to incorp	Plan review viability of plan update. The ructure required to ms to have continued so do not suggest this is adapt to Climate e features should be spment. Housing ideration policy
	Key site allocations are delivering, or on course to deliver,	Disagree	•	ce to plan policies, se	ctions and relevant
	in accordance the local plan policies meaning that the delivery of the spatial strategy is not at risk.		evidence sources):		
	delivery of the spatial strategy is not at risk.		The following strateg	ic sites are the largest	allocations in the
	PROMPT:		Local Plan.	5	
A8.	Identify which sites are control to the delivery of very		Cito	Local Dian	Ctatus
	Identify which sites are central to the delivery of your spatial strategy. Consider if there is evidence to suggest that		Site	Local Plan Trajectory	Status
	lack of progress on these sites (individually or collectively)		Policy LPP 17	First completions	Pre-application
	may prejudice the delivery of housing numbers, key		Strategic Growth	2023/24	
	infrastructure or other spatial priorities. Sites may be		Location - Land	,	
	deemed to be key by virtue of their scale, location or type in		East of Great		

addition to the role that may have in delivering any associated infrastructure.	Notley, South of Braintree Policy LPP 18 Strategic Growth Location - Land East of Broad Road, Braintree First completions 2022/23	Outline permission granted. Reserved matters pending. Sitework not started.
	Policy LPP 19 Strategic Growth Location – Former Towerlands Park Site	Permission granted Site part completed (on schedule) Further completions constrained by S.106.
	Policy LPP 20 First completions Strategic Growth Location - North West Braintree (Panfield Lane)	Hybrid Permission granted. Technical start made.
	Policy LPP 21 First completions Strategic Growth Location - Land at Feering	In pre-application (Still on schedule)
	Policy LPP 22 First Completions Strategic Growth Location – Wood End Farm Witham	Outline permission.

			Overall key sites are not coming forward in accordance with the trajectory published with the Local Plan. While design codes, outline masterplans and parameter plans have been approved for Strategic Site Allocations and planning permission has been granted (4/6 sites) or are progressing via pre-application work (2 site), sites have not started or are constrained due to circumstances outside of the Council's direct control. As such, the overall Spatial Strategy is being supported by the delivery of sites in the 100-499 range some of which were granted on appeal. All site allocations, including the above strategic sites, will be reviewed see if there is the expected progress and if those commenced are expected to deliver at previously expected rates.
	There have been no significant changes to the local environmental or heritage context which have implications for the local plan approach or policies.	Disagree	Reason (with reference to plan policies, sections and relevant evidence sources):
A9.	PROMPT: You may wish to review the indicators or monitoring associated with your Sustainability Appraisal (SA) / Strategic Environmental Assessment (SEA) / Habitats Regulations Assessment (HRA).		There have been no major changes to Air Quality Management Areas (AQMAs). The A131 at Halstead remains a priority for air quality monitoring and an analysis of Nox, PM10 and PM2.5 for the next 16/15 years could be helpful for the SA and for examination. Zones of influences around Essex Estuaries Special Area of
	Identify if there have been any changes in Flood Risk Zones, including as a result of assessing the effects of climate change.		Conservation (SAC) and Crouch and Roach Estuaries Special Protection Areas (SPA) are currently covered by the Essex Coast Recreational Disturbance Avoidance and Mitigation Strategy (RAMS), and there have been no change to this since plan adoption. The zones of influence for the Hatfield Forest Site of Special Scientific Interest (SSSI) and National Nature Reserve

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.

(NNR) have recently been extended but does not affect the District.

The South East In Shore Marine Plan has been adopted since the Local Plan was adopted and will be taken into account as part of the review, alongside the emerging Essex Water Strategy due for completion in late 2023.

Essex County Council is reviewing the Essex Minerals Local Plan and recently concluded their second reg 18 consultation. This review suggests that additional minerals site allocations will be necessary, along with associated safeguarded areas. There may also be changes to how sites are assessed for viability of mineral extraction before other developments proceed. The emerging minerals Local Plan will be considered during the Braintree Local Plan review process, with ongoing liaison facilitated through the Duty-to-Cooperate process.

The Environment Act introduced new regulations in 2022-24 so new requirements will need to be reflected in plan policies, for example, on Biodiversity Net gain and Nature Recovery Networks.

There are no new heritage designations that impact allocations.

The Council will consider whether planning policies are working well in relation to applications and appeals decisions, and opportunities to make policies more effective. No key concerns are identified in the AMR 2022/23, but this will be kept under review in consultation with statutory consultees.

	No new sites have become available since the finalisation of the adopted local plan which require the spatial strategy to be re-evaluated.	Disagree	Reason (with reference to plan policies, sections and relevant evidence sources):
A10.	PROMPT: 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.		The results of the Call for Sites will be published in summer 2024 and will reveal where any new sites have become available for residential, employment, retail, energy and other uses. In addition, the land availability for employment and retail will be reviewed as where any loss of retail/office/employment space a result of macro economic factors will be accounted for.

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		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.	Disagree	Reason (with reference to plan policies, sections and relevant evidence sources): The Infrastructure Delivery Plan (IDP) will be reviewed as part of the review to inform viability work as well as any changes to policy and site allocation requirements.
	A11.	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.		The Local Plan review will consider the deliverability of the following projects: • Millennium Slips. • A12 to A120 Widening DCO. • Panfield Lane Link Road. • Cut throat lane link road.
		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.		No Compulsory Purchase Orders are being pursued in relation to site allocations.
		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.		

All policies in the plan are achievable and effective including for the purpose of decision-making.

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.

A12.

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. Disagree

Reason (with reference to plan policies, sections and relevant evidence sources):

The review plan will consider where planning policies are working well in relation to applications and appeals decisions, and opportunities to make them more effective. No key concerns are identified in the AMR 2022/23, but this will be kept under review and comments on policy effectiveness will be invited from the public during the regulation 18 consultation stage.

The review will ensure that policies are compliant with the 2023 NPPF and meet new local aspirations, for example, to address the climate change emergency. The emerging evidence base will also help to inform policy development.

Policies requiring changes include employment and retail as a result of the 2020 amendment of the Use Class Order.

Part 2 of the Toolkit outlines how much of the Local Plan meets NPPF requirements including in relation to relating to the countryside, plan content and communications.

However, as the Local Plan was not written against the latest NPPF, some aspects are not fully reflected including policies on Housing, Design, Biodiversity, Town Centres and Transport. The adopted Local Plan will be revised to ensure that it fully NPPF compliant.

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.

PROMPT:

In making this assessment you may wish to:

- 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

Reason (with reference to plan policies, sections and relevant evidence sources):

The review will consider new and emerging plans including:

- Essex Minerals Plan Reg 18 consultation, published May 2024
- Maldon District Issues and Options consultation, published February 2022
- Chelmsford Preferred Options Consultation, published May 2024
- West Suffolk Local Plan Submitted for examination May 2024
- Colchester Local Plan Review evidence gathering
- Uttlesford preferred options, published December 2023

Ongoing discussions will take place with adjoining neighbouring local planning authorities on the review and progress with their own Local Plans through the Duty-to-Cooperate. Regard will be had to cross-boundary issues identified through these meetings.

The review will also consider the implications of Development Consent Order proposals within the area including the A12 widening, Longfield Solar Farm, Rivenhall IWMF, Norwich to Tilbury and National Grid Green.

A13.

	There are no local political changes or a revised / new	Agree	Reason (with reference to plan policies, sections and relevant
	corporate strategy which would require a change to the		evidence sources): There is a need to update the Plan in respect
	approach set out in the current plan.		of the current administrations objectives, plans and strategies
			and how policies can better reflect these including the Corporate
	PROMPT:		Plan (published on March 2024), SELEP Economic Plan, Medium
	In making this assessment you may wish to:		Term Financial Strategy and Climate Change Strategy. The Council
			declared a Climate Emergency on July 2019 which committed the
	Review any manifesto commitments and review the		Council to being carbon neutral by 2030 and to supporting
A14.	corporate and business plan.		communities and businesses to transition.
A14.	 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. 		There may be a need to update the Plan in light of other plans or strategies produced by other partners such as the emerging update to the Essex Minerals Local Plan. The Sustainability Appraisal (SA) will review the relevant policies and programme for the review of the Local Plan. This will feed into a framework which we will use to assess the potential environmental, social, economic and health performance of the Local Plan and any reasonable alternatives.

	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.

	<u>Decision:</u> Update plan policies				
	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):				
A17.	NDG and NMDC				
	- The policies do not take into account the latest plans, policies and strategies in relation to Economic Development, Climate Emergency, the Environment Bill (including BNG, LNRS and Tree-lined streets) and the Council's strategic priorities.				
	Other actions that may be required in addition to or in place of an update of plan policies None				
	B. POLICY UPDATE FACTORS	YES/NO (please indicate	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.	Yes	Change from OAN to Standard Methodology has increased the housing requirement to dpa. Extension to plan period to 2041 will require re-evaluation of housing, employment, retail and other needs.		
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.	Yes	While the Council can demonstrate a five-year housing land supply and performs well against the Housing Delivery Test, the growth strategy is not fully delivering on key objectives in all areas.		

			Some strategic growth allocations are not being built out as expected and does not accord with the adopted Local Plan trajectory Some key planned infrastructure projects critical to plan delivery have stalled
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.	Yes	An update of housing and employment policies are expected to have consequential impacts on other policies of the plan.
	You have answered yes to one or more questions above.	Yes	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	Decision: Full Update of Plan Policies Reasons for scope of review: As above		

Date of assessment:	24/07/2024	
Assessed by:	Gary Sung, Senior Planning Policy Officer	
Checked by:	Sarah Ashton, Planning Policy Manager	
Comments:	N/A	