

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

Why you should use this part of the toolkit

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

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 Completing the matrix will help you understand which policies may be out of date for the purposes of decision making or where circumstances may have changed and whether or not the policy / policies in the plan continue to be effective in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

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

How to use this part of the toolkit

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

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

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

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

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

How to use the results of this part of the toolkit

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

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
A	PLAN REVIEW FACTORS		
A1.	The plan policies still reflect current national planning policy requirements.	Agree	The current development plan documents are broadly in conformity with the National Planning Policy Framework, however it is recognised that as the documents were adopted prior to the updated framework, which was published in February 2019, a review would provide the opportunity to ensure alignment.
A2.	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).	Disagree	The current Local Plan (consisting of the Core Strategy, Development Management Plan and Site Allocations Plan) identifies the district's housing requirements for the plan period 2006-2026 as 20,985 dwellings, equivalent to 1,049 homes per year. Using the Government's standard methodology calculation, the local housing need figure is 1,369 homes per year.
A3.	You have a 5-year supply of housing land	Disagree	At April 2019 the supply of deliverable housing sites was 4.4 years.
A4.	You are meeting housing delivery targets	Disagree	The most recently published Housing Delivery Test results were published by the Government in February 2019. At that time, North Somerset's result was 73%. When the next iteration is published we expect the result to be around 78%. These results trigger the need for an Action Plan to be produced, and a 20% buffer to be applied when calculating the five year supply requirement, to ensure flexibility and choice.

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
A5.	Your plan policies are on track to deliver other plan objectives including any (i) affordable housing targets; and (ii) commercial floorspace/jobs targets over the remaining plan period.	Agree	<p>During the plan period to date, 1,760 affordable homes have been delivered, 90% of the target in Core Strategy Policy CS16.</p> <p>Commercial floorspace completions are monitored annually and reported within the Authority Monitoring Report. The employment policies are recently adopted and tested at examination.</p>
A6.	There have been no significant changes in economic conditions which could challenge the delivery of the Plan, including the policy requirements within it.	Disagree	<p>Forecasts for economic growth and corresponding jobs growth is indicating a significant increase compared to the levels previously planned for in the North Somerset Core Strategy. The latter had embedded within it the expected outcomes of the 2008 recession that had a major impact on the economy and specifically in relation to business development, the provision of speculative business premises and appetite for investment.</p> <p>However, whilst the prospects for job growth has increased, Brexit provides significant uncertainty that filters down to the economy of North Somerset and issues such as relative sector growth.</p> <p>The increased employment prospects do have implications for the scale of housing required, taking into account commuting patterns, and demographic factors. This too has a relationship to future potential changes in commuting patterns as a result of increasing climate change action. This may make it all the more important to achieve more self-contained places, reducing the need for the labour force to out-commute.</p> <p>Potential expansion of Bristol Airport may be a key issue that could influence change in the North Somerset economy.</p> <p>Evidence indicates a need to reconsider the distribution of employment allocations across North Somerset in connection with the wider dynamics of the Functional Economic Market Area (FEMA). There may be a case for greater allocation closer to Bristol. Evidence also indicates the importance of allocating sufficient business space for high-value sectors within the towns as a basis for improving long-term prosperity and delivering on regeneration objectives.</p>

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
A7.	There have been no significant changes affecting viability of planned development.	Agree	Viability has been most recently fully considered through the Community Infrastructure Levy examination. As the CIL was adopted recently, during similar economic conditions to now, the evidence underpinning it is considered to still be up to date.
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.	Agree	<p>The strategic Weston Villages development sites are on course to deliver the originally anticipated level of housing, employment and associated infrastructure, despite original lead-in times and delays.</p> <p>These sites are being brought forward in line with the development plan context for them (Core Strategy Policy CS30), and in broad accordance with a detailed masterplan framework.</p>

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
A9.	<p>There have been no significant changes to the local environmental or heritage context which have implications for the local plan approach or policies.</p>	Disagree	<p>In respect of ecology, the North Somerset and Mendip Bats Special Area of Conservation is a European site of importance for wildlife, designated for its importance for Greater and Lesser Horseshoe Bats. Impacts of development on the SAC must be considered, in line with the new tests set out in national guidance.</p> <p>Three new conservation areas have been designated within the district since the adoption of the extant development plan documents, namely Barrow Gurney Conservation Area, Great Weston Conservation Area and Churchill Conservation Area.</p> <p>The Council has declared a climate emergency. An action plan has been drafted, setting out a series of initiatives, projects and policy changes aimed at achieving carbon neutral status by 2030. Development Plan policies will need to support this strategy.</p> <p>North Somerset has significant flood risk constraints. Flood risk modelling, mapping and assessment is being updated, and will take account of the impacts of climate change that may occur in future.</p>
A10.	<p>There are no new sites that have become available since the finalisation of the adopted local plan which require the spatial strategy to be re-evaluated.</p>	Agree	<p>The Council has kept open a 'call for sites' on a rolling basis. The Site Allocations Plan was adopted less than two years ago, informed by a Strategic Housing Land Availability Assessment, and as such assessed the development potential of all known sites.</p> <p>A new Strategic Housing Land Availability Assessment is being prepared.</p>

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
A11.	<p>Key planned infrastructure projects critical to plan delivery are on track and have not stalled / failed and there are no new major infrastructure programmes with implications for the growth / spatial strategy set out in the plan.</p>	Agree	<p>Core Strategy Policy CS10 listed 18 major transport schemes, and the Development Management Policies Plan allocated safeguarded alignments where necessary. The Joint Local Transport Plan provides further details and progress is monitored against it.</p> <p>Key projects such as MetroWest (Portishead Rail) and the Banwell bypass are progressing.</p>
A12.	<p>All policies in the plan are achievable and effective including for the purpose of decision-making.</p>	Agree	<p>The Council's policies and plans are up to date, having recently been found sound and adopted.</p> <p>The policies are broadly considered to be achievable and effective for the purpose of decision making currently, however the development management policies will be thoroughly assessed to determine whether they need to be refreshed or updated to reflect the most</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>	Disagree	<p>The Council was working jointly with the West of England authorities on the Joint Spatial Plan. Following the hearings in July 2018 and consideration of the Inspectors' letter, North Somerset withdrew from the JSP process in January 2020. The Council will continue to work closely with the West of England authorities on relevant strategic issues through the duty to co-operate and through the post-JSP plan-making arrangements as these are confirmed. The key issues cross-boundary issues will be the spatial strategy, the quantum and distribution of growth to meet housing and economic development needs and the provision of strategic infrastructure, primarily transport. The Council will also work engage on strategic matters relating to neighbouring authorities to the south, including potential development opportunities through the review of the Sedgemoor Local Plan.</p>
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>	Disagree	<p>Political control of the Council changed in May 2019 following the local elections. A new Corporate Plan is being prepared to reflect the aims, ambitions and priorities of the new administration.</p> <p>A new Local Plan is needed to reflect these aims, ambitions and priorities, and update policies to align them to the Corporate Plan objectives where necessary.</p>

	ASSESSING WHETHER OR NOT TO UPDATE YOUR PLAN POLICIES	YES/NO (please indicate below)	
A15.	You AGREE with <u>all</u> of the statements above	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: Update plan policies</p> <p>Reasons for decision on whether or not to update plan policies (clear evidence and justification will be required where a decision not to update has been reached): The housing requirement set out in Policy CS13 of the Core Strategy needs to be reviewed. Housing delivery and supply in recent years has fallen short of the requirement, and the reasons for this and actions to address them need to be considered. Review provides the opportunity to re-consider the aims, objectives, priorities and policies within the development plan to ensure alignment with the emerging Corporate Plan and address the climate change challenge.</p>		

	B. POLICY UPDATE FACTORS	YES/NO (please indicate below)	Provide details explaining your answer in the context of your plan / local authority area
B1	Your policies update is likely to lead to a material change in the housing requirement which in turn has implications for other plan requirements/ the overall evidence base.	YES	The local housing need figure generated using the standard methodology is significantly higher than the adopted housing requirement.
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	The scale of housing required means that the spatial strategy will need to be reviewed, taking account of social, economic and environmental factors.
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	To deliver the scale of housing required in the most sustainable way it is likely that additional strategic growth areas in sustainable locations will need to be identified.
	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	NO	If you are confident that the update can be undertaken without impacting on your spatial strategy and other elements of the Plan, you are likely to only need to undertake a partial update of policies. Complete Section B4 to indicate the specific parts / policies of the plan that are likely to require updating based on the answers you have given above.
B4	<p>Decision: Full Update of Plan Policies</p> <p>Reasons for scope of review: The scale of housing that needs to be planned for is so significant that a full review of the development plan is considered necessary – the required quantum of growth warrants a full update of the strategic policies, spatial strategy and settlement hierarchy, and ultimately additional allocations will need to be identified.</p> <p>Alongside this, a review of the non-strategic policies provides the opportunity to ensure alignment with national policy and guidance is maintained, and take account of the climate emergency context.</p>		

Date of assessment:	January 2020
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Comments:	/