

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 Completing the matrix will help you understand which policies may be out of date for the purposes of decision making or where circumstances may have changed and whether or not the policy / policies in the plan continue to be effective in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

	<b>Matters to consider</b>	<b>Agree / Disagree</b>	<b>Extent to which the local plan meets this requirement</b>
<b>A</b>	<b>PLAN REVIEW FACTORS</b>		
<b>A1.</b>	<p><b>The plan policies still reflect current national planning policy requirements.</b></p> <p><b>PROMPT:</b> 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.	The Borough Plan (2011-2031) was not prepared using the NPPF (2021) and therefore, some aspects of the latest NPPF are not fully reflected in the plan, including in respect of housing. The Borough Plan (2011-2031) will be reviewed to ensure that it is fully NPPF compliant.
<b>A2.</b>	<p><b>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).</b></p> <p><b>PROMPT:</b> 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 Borough Plan (2011-2031) sets a requirement of 14,060 dwellings across the plan period. The Council have utilised a stepped trajectory comprising of 502 dwellings per annum for the period 2011-2018 and 812 dwellings per annum between 2018-2031.</p> <p>The housing requirement proposed for the emerging Borough Plan Review is 9,810 homes, based on 545 dwellings per annum. The latest standard method figure is 435 dwellings per annum. However, it is considered that the quantity to be proposed in the Borough Plan Review remains deliverable.</p> <p>The size, type and tenure of housing needed for different groups in the community will be reviewed in a revised Housing and Economic Development Needs Assessment (HEDNA).</p>

	<b>Matters to consider</b>	<b>Agree / Disagree</b>	<b>Extent to which the local plan meets this requirement</b>
<b>A3.</b>	<p><b>You have a 5-year supply of housing land.</b></p> <p><b>PROMPT:</b> Review your 5-year housing land supply in accordance with national guidance including planning practice guidance and the Housing Delivery Test measurement rule book.</p>	Agree.	The latest 5-year housing land supply shows, as of 1 <sup>st</sup> April 2023, that Nuneaton and Bedworth Borough Council has a 5.3 year housing land supply.
<b>A4.</b>	<p><b>You are meeting housing delivery targets.</b></p> <p><b>PROMPT:</b> Use the results of your most recent Housing Delivery Test, and if possible, try and forecast the outcome of future Housing Delivery Test findings. Consider whether these have/are likely to trigger the requirement for the development of an action plan or trigger the presumption in favour of sustainable development. Consider the reasons for this and whether you need to review the site allocations that your plan is reliant upon. In doing so you need to make a judgement as to whether updating your local plan will support delivery or whether there are other actions needed which are not dependent on changes to the local plan.</p>	Agree.	<p>The Department for Levelling Up, Housing and Communities and Ministry of Housing, Communities and Local Government published, in January 2022, the Housing Delivery Test score for Nuneaton and Bedworth Borough Council. The score was 117%.</p> <p>Given the current rate of housing delivery and strategic allocations coming forward, meeting the Council's housing delivery targets is not expected to be an issue. An action plan or presumption in favour of sustainable development is unlikely to be triggered.</p>
<b>A5.</b>	<p><b>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.</b></p> <p><b>PROMPT:</b> Use (or update) your Authority Monitoring Report to assess delivery.</p>	Agree but needs to be carefully monitored.	The Authority Monitoring Report shows that the Borough Plan (2011-2031) policies are generally on track to deliver other plan objectives (e.g. affordable housing targets and commercial floorspace targets) over the remaining plan period. However, as set out in Para 4.18 of the Authority Monitoring Report (2021-2022), whilst there has generally been an increasing trend in the delivery of affordable housing units there was a slight dip in affordable housing completions from 24% in 2020/2021 to 20.5% in 2021/2022.

	<b>Matters to consider</b>	<b>Agree / Disagree</b>	<b>Extent to which the local plan meets this requirement</b>
<b>A6.</b>	<p><b>There have been no significant changes in economic conditions which could challenge the delivery of the Plan, including the policy requirements within it.</b></p> <p><b>PROMPT:</b> A key employer has shut down or relocated out of the area.</p> <p>Unforeseen events (for example the Covid-19 Pandemic) are impacting upon the delivery of the plan.</p> <p>Up-to-date evidence suggests that jobs growth is likely to be significantly more or less than is currently being planned for.</p> <p>Consider if there is any evidence suggesting that large employment allocations will no longer be required or are no longer likely to be delivered.</p> <p>You will need to consider whether such events impact on assumptions in your adopted local plan which have led to a higher housing requirement than your local housing need assessment indicates.</p> <p>Consider what the consequences could be for your local plan objectives such as the balance of in and out commuting and the resultant impact on proposed transport infrastructure provision (both capacity and viability), air quality or climate change considerations.</p>	Agree.	<p>Brexit impacts may emerge over time and will need to be taken into account in any future updates of the Borough Plan, should they need addressing through policy.</p> <p>The Covid-19 pandemic has had an impact on the local economy and there are macro factors driving business decisions – operational costs, utility costs, amount of space actually required given hybrid working etc.</p> <p>Town Centre retail is constricting, and our town centres will need to adapt to the changing demands and needs of customers.</p> <p>The Borough Plan Review will address the need for a flexible approach to employment space provision. To date there has been no loss or relocation of major employers within the Borough and whilst there are a number of strategic employment allocations within the Borough Plan Review, with the majority of these sites either benefitting from permission or with an application pending, there is no evidence to suggest that the large employment allocations will no longer be required or are unlikely to be delivered.</p>

	<b>Matters to consider</b>	<b>Agree / Disagree</b>	<b>Extent to which the local plan meets this requirement</b>
<b>A7.</b>	<p><b>There have been no significant changes affecting viability of planned development.</b></p> <p><b>PROMPT:</b> You may wish to look at the Building Cost Information Service (BCIS) All-in Tender Price Index, used for the indexation of Community Infrastructure Levy (CIL), or other relevant indices to get a sense of market changes.</p> <p>Consider evidence from recent planning decisions and appeal decisions to determine whether planning policy requirements, including affordable housing, are generally deliverable.</p> <p>Ongoing consultation and engagement with the development industry may highlight any significant challenges to delivery arising from changes in the economic climate.</p>	Agree.	The viability of the policies within the Borough Plan Review will need to be reviewed. As set out in the Authority Monitoring Report, whilst in general delivery of affordable housing within the Borough is good, there is a chronic need for affordable housing units and this will need to be considered within the review. However, generally there is nothing to suggest, within recent planning decisions, that the delivery of affordable housing within the Borough is not deliverable.
<b>A8.</b>	<p><b>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.</b></p> <p><b>PROMPT:</b> 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 they may have in delivering any associated infrastructure.</p>	Agree.	Overall, all key strategic sites are coming forward. A number of masterplans have been approved for Strategic Site Allocations and planning applications are being considered / under preparation. As such it is considered the Spatial Strategy is robust.

	<b>Matters to consider</b>	<b>Agree / Disagree</b>	<b>Extent to which the local plan meets this requirement</b>
A9.	<p><b>There have been no significant changes to the local environmental or heritage context which have implications for the local plan approach or policies.</b></p> <p><b>PROMPT:</b> 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 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>An update to the Strategic Flood Risk Assessment (SFRA) has been commissioned to provide an overview for all sources of flood risk and the current and future impacts of climate change throughout the plan area.</p> <p>There have been no major changes to Air Quality Management Areas (AQMAs).</p> <p>There have been no new environmental or heritage designations that could impact on the delivery of housing or employment targets.</p> <p>Borough Plan policies (2011-2031) are working well in delivering effective planning decisions.</p>

	<b>Matters to consider</b>	<b>Agree / Disagree</b>	<b>Extent to which the local plan meets this requirement</b>
<b>A10.</b>	<p><b>No new sites have become available since the finalisation of the adopted local plan which require the spatial strategy to be re-evaluated.</b></p> <p><b>PROMPT:</b> 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.	The Borough Plan includes land at Tuttle Hill, adjacent to Judkins Quarry, as a strategic allocation for residential development. Whilst no new brownfield sites have become available since the adoption of the plan, which would require the spatial strategy to be re-evaluated, discussions have been ongoing between the promoters of the land at Judkins Quarry and the Council as to whether the site could form a longer term development site for residential and employment uses. These discussions are still in their infancy and re-development is subject to wider investment opportunities.
<b>A11.</b>	<p><b>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.</b></p> <p><b>PROMPT:</b> You may wish to review your Infrastructure Delivery Plan / Infrastructure Funding Statement, along with any periodic updates, the Capital and Investment programmes of your authority or infrastructure delivery partners and any other tool used to monitor and prioritise the need and delivery of infrastructure to support development.</p> <p>Check if there have been any delays in the delivery of critical infrastructure as a result of other processes such as for the Compulsory Purchase of necessary land.</p> <p>Identify whether any funding announcements or decisions have been made which materially impact upon the delivery of key planned infrastructure, and if so, will this impact upon the delivery of the Local Plan.</p>	Agree.	<p>The Infrastructure Delivery Plan (IDP) and Infrastructure Funding Statement (IDS) will be reviewed in order to inform viability work as well as any changes to policy and site allocations.</p> <p>No Compulsory Purchase Orders will be involved in bringing forward allocations.</p>




	<b>Matters to consider</b>	<b>Agree / Disagree</b>	<b>Extent to which the local plan meets this requirement</b>
<b>A12.</b>	<p><b>All policies in the plan are achievable and effective including for the purpose of decision-making.</b></p> <p><b>PROMPT:</b> 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>The Borough Plan Review will consider where planning policies are working well in relation to applications and appeal decisions and make amendments to policies where necessary.</p> <p>Part 2 of the PAS Toolkit outlines to what extent the Borough Plan (2011-2031) policies meet NPPF requirements. The Borough Plan (2011-2031) was produced before the latest NPPF (2021) was published and therefore, some aspects are not reflected in the Plan.</p>

	<b>Matters to consider</b>	<b>Agree / Disagree</b>	<b>Extent to which the local plan meets this requirement</b>
<b>A13.</b>	<p><b>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.</b></p> <p><b>PROMPT:</b> In making this assessment you may wish to:</p> <ul style="list-style-type: none"> <li>● Review emerging and adopted neighbouring authority development plans and their planning context.</li> <li>● Review any emerging and adopted higher level strategic plans including, where relevant, mayoral/ combined authority Spatial Development Strategies e.g. The London Plan.</li> <li>● Review any relevant neighbourhood plans.</li> <li>● 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.</li> <li>● 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.</li> </ul>	Disagree.	<p>Emerging Local Plans, within the Coventry and Warwickshire Housing Market Area, are likely to have a material impact on any update to the Borough Plan.</p> <p>The Coventry and Warwickshire authorities have commissioned a joint HEDNA.</p> <p>The quantity of Coventry City Council's unmet housing need, as part of the preparation of their Local Plan and the apportionment of the unmet need through the agreement of a Statement of Common Ground, may impact upon the strategic planning context for Nuneaton and Bedworth Borough.</p>

	<b>Matters to consider</b>	<b>Agree / Disagree</b>	<b>Extent to which the local plan meets this requirement</b>
<b>A14.</b>	<p><b>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.</b></p> <p><b>PROMPT:</b> In making this assessment you may wish to:</p> <ul style="list-style-type: none"> <li>● Review any manifesto commitments and review the corporate and business plan.</li> <li>● Engage with your senior management team and undertake appropriate engagement with senior politicians in your authority.</li> <li>● 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.</li> </ul>	Disagree.	There is a need to update the Borough Plan (2011-2031) to reflect the current objectives, plans and strategies of Nuneaton and Bedworth Borough Council, including the Council's Corporate Plan – Building a Better Borough (2022).

	ASSESSING WHETHER OR NOT TO UPDATE YOUR PLAN POLICIES	YES/NO (please indicate below)	
A15.	You <b>AGREE</b> with <u>all</u> of the statements above.	No.	<p><b>If no</b> go to question A16.</p> <p><b>If yes</b>, 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 <b>DISAGREE</b> 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 <u>why</u> an update to plan policies is necessary in section A17 below and complete Section B below.
A17.	<p><b>Decision:</b> Update Nuneaton and Bedworth Borough Council's Borough 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):</p> <ul style="list-style-type: none"> <li>- The Borough Plan (2011-2031) makes a policy commitment to reviewing the Borough Plan.</li> <li>- The Borough Plan needs to reflect the latest national planning policy and planning policy guidance on housing numbers as it was previously based on Objectively Assessed Housing Needs.</li> <li>- Policies need to reflect the latest NPPF (2021).</li> <li>- Changes to economic needs and working patterns as a result of Covid-19.</li> <li>- Changes in administration priorities and strategies need to be reflected in the Borough Plan.</li> </ul>		

	- Plan needs to be extended to cover a minimum 15-year period.		
	<b>B. POLICY UPDATE FACTORS</b>	<b>YES/NO (please indicate below)</b>	<b>Provide details explaining your answer in the context of your plan / local authority area</b>
<b>B1.</b>	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 Borough Plan needs to be updated to reflect the latest national planning policy and planning policy guidance methodology for calculating housing need.
<b>B2.</b>	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.	Whilst the current strategy is broadly fit for purpose, the strategy will need to evolve, taking into consideration the up-to-date HEDNA.
<b>B3.</b>	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 Borough Plan Review will need to update policies following the outcomes of the HEDNA. Additional site policies may be required to facilitate additional growth.
	<b>You have answered yes to one or more questions above.</b>		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.
	<b>You have said no to <u>all</u> questions (B1 to B3) above.</b>		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.
<b>B4.</b>	<p><b>Decision:</b> Full update of Nuneaton and Bedworth Borough Council's Borough Plan policies.</p> <p><b>Reasons for scope of review:</b> The Borough Plan (2011-2031) needs to be updated to reflect the latest national planning policy and planning practice guidance, in particular in relation to calculating housing need and changes in economic requirements.</p>		

<b>Date of assessment:</b>	1 <sup>st</sup> November 2021.
<b>Assessed by:</b>	Jacqueline Padbury. 
<b>Checked by:</b>	Ashley Baldwin. <i>Ashley Baldwin</i> Head of Planning
<b>Comments:</b>	