

Appendix 3: PAS LOCAL PLAN ROUTE MAPPER TOOLKIT PART 1 - LOCAL PLAN REVIEW ASSESSMENT

Why you should use this part of the toolkit

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

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 Completing the matrix will help you understand which policies may be out of date for the purposes of decision making or where circumstances may have changed and whether or not the policy / policies in the plan continue to be effective in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

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

How to use this part of the toolkit

Before using this assessment tool it is important that you first consider your existing plan against the key requirements for the content of local plans which are included in the Planning and Compulsory Purchase Act 2004 (as amended); The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) and the most up to date NPPF,

PPG, Written Ministerial Statements and the National Model Design Code. To help you with this **Part 2 of the toolkit** provides a checklist which sets out the principal requirements for the content and form of local plans against the relevant paragraphs of the NPPE. 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 / Other	Extent to which the local plan meets this requirement
A	PLAN REVIEW FACTORS		
A1.	<p>The plan policies still reflect current national planning policy requirements.</p> <p>PROMPT:</p> <p>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>	Mainly agree	<p>Reason (with reference to plan policies, sections and relevant evidence):</p> <ul style="list-style-type: none"> • LPSS prepared and examined under transitional arrangements and NPPF 2012 • Changes to the Use classes order in particular new Class E are significant and likely to impact on retail and office policies. • The Government intends to introduce plan-making reforms in Autumn 2024 with a requirement that all local planning authorities replace existing local plans by preparing ‘new style’ local plans. Part 2 of the toolkit relates to

	Matters to consider	Agree / Disagree / Other	Extent to which the local plan meets this requirement
			the existing NPPF which is expected to change. It will be necessary to assess the extent to which existing policies accord with national policy following the introduction of the new plan-making system.
A2.	<p>There has not been a <u>significant</u> change in local housing need numbers from that specified in your plan (accepting there will be some degree of flux).</p> <p>PROMPT:</p> <p>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</p>	Disagree	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <ul style="list-style-type: none"> • Present Standard Method is significantly higher (779 dwellings per annum) than the housing requirement in the LPSS, which is set out under LPSS Policy S2 as 562 dwellings per annum over the plan period (2015-2034).

	Matters to consider	Agree / Disagree / Other	Extent to which the local plan meets this requirement
	<p>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>		
A3.	<p>You have a 5-year supply of housing land</p> <p>PROMPT:</p> <p>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	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <ul style="list-style-type: none"> • Currently able to demonstrate a 5YHLS and HDT.

	Matters to consider	Agree / Disagree / Other	Extent to which the local plan meets this requirement
A4.	<p>You are meeting housing delivery targets</p> <p>PROMPT:</p> <p>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	<ul style="list-style-type: none"> • The Council has moved from having to provide a 20% buffer to a 5% buffer in April 2020 when calculating the 5YHLS based on the results of the Housing delivery Test. This has contributed to our ability to demonstrate a robust and healthy 5YHLS. • The ability to maintain this (both with the LPSS figure and the Standard Method figure when this is applicable after 5 years) will depend largely on the progress and delivery of the strategic sites. It is important to note that there is a considerable time lag from when a planning application is permitted, particularly if only an outline permission, to when it is actually delivering housing completions. Any delays to planning permissions, particularly on the larger strategic sites, will have a significant impact on the short term delivery of homes and the ability to maintain a rolling five year supply.

	Matters to consider	Agree / Disagree / Other	Extent to which the local plan meets this requirement
A5.	<p>Your plan policies are on track to deliver other plan objectives including any (i) affordable housing targets including requirements for First Homes; and (ii) commercial floorspace/jobs targets over the remaining plan period.</p> <p>PROMPT:</p> <p>Use (or update) your Authority Monitoring Report to assess delivery.</p>	Mainly agree	<ul style="list-style-type: none"> • Affordable housing delivery remains at a relatively low level however it is envisaged that this will increase significantly when the strategic sites begin delivering • The LPDMP includes a policy on First Homes • The majority of the commercial and retail need has not been delivered yet. This needs to be reassessed in light of the changes to the economy and the scale of the need following COVID. Recent evidence provided re retail need in relation to a planning application indicated a significant fall in retail need from the figure used in the 2019 LP.

	Matters to consider	Agree / Disagree / Other	Extent to which the local plan meets this requirement
A6.	<p>There have been no significant changes in economic conditions which could challenge the delivery of the Plan, including the policy requirements within it.</p> <p>PROMPT:</p> <p>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</p>	Disagree	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <ul style="list-style-type: none"> • An updated assessment of employment needs is required as there has likely been significant changes since the plan was adopted. • There is uncertainty regarding the appetite to provide the allocated employment space of the strategic sites. • Applicants have been claiming lack of demand for strategic office facilities in part as a result of the increase of working from home. • The Employment policies do allow for marketing evidence to be provided in support of changes of use.

	Matters to consider	Agree / Disagree / Other	Extent to which the local plan meets this requirement
	<p>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>		

	Matters to consider	Agree / Disagree / Other	Extent to which the local plan meets this requirement
A7.	<p>There have been no significant changes affecting viability of planned development.</p> <p>PROMPT:</p> <p>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>	Mainly agree	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <ul style="list-style-type: none"> • The LPDMP is supported by a Viability Study. This has re-assessed the viability implications of the LPSS requirements to understand what headroom is available to support the requirements in the LPDMP. This concludes that the cumulative requirements of both plans do not threaten the overall delivery of the Local Plan. • Viability concerns at planning application stage tend to be limited to sites with abnormal costs. • The impacts on viability of the significant changes in interest rates and inflation have not been considered through the recent plan making process.

	Matters to consider	Agree / Disagree / Other	Extent to which the local plan meets this requirement
A8.	<p>Key site allocations are delivering, or on course to deliver, in accordance the local plan policies meaning that the delivery of the spatial strategy is not at risk.</p> <p>PROMPT:</p> <p>Identify which sites are central to the delivery of your spatial strategy. Consider if there is evidence to suggest that lack of progress on these sites (individually or collectively) may prejudice the delivery of housing numbers, key infrastructure or other spatial priorities. Sites may be deemed to be key by virtue of their scale, location or type in addition to the role that may have in delivering any associated infrastructure.</p>	Mainly agree	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <ul style="list-style-type: none"> • The strategic sites are key to providing housing and commercial development. Their delivery has been slower than originally anticipated. • There is uncertainty regarding the impact of the cancellation of the A3 scheme. Work is underway with GBC, SCC and National Highways to consider alternative transport improvements in relation to the A3. • The A3/M25 DCO is currently under construction.

	Matters to consider	Agree / Disagree / Other	Extent to which the local plan meets this requirement
A9.	<p>There have been no significant changes to the local environmental or heritage context which have implications for the local plan approach or policies.</p> <p>PROMPT:</p> <p>You may wish to review the indicators or monitoring associated with your Sustainability Appraisal (SA) / Strategic Environmental Assessment (SEA) / Habitats Regulations Assessment (HRA).</p> <p>Identify if there have been any changes in Flood Risk Zones, including as a result of assessing the effects of climate change.</p> <p>Consider whether there have been any changes in air quality which has resulted in the designation of an Air Quality Management Area(s) or which would/could result in a likely significant effect on a European designated site which could impact on the ability to deliver housing or employment allocations.</p> <p>Consider whether there have been any changes to</p>	Mainly agree	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <ul style="list-style-type: none"> • The LPDMP contains further policies on heritage and environmental (climate change and biodiversity) • There is ongoing work with the Environment Agency in relation to a Guildford Town Centre Flood Alleviation Scheme. • There is a new Air Quality Management Area in Guildford town centre. The LPDMP includes a policy on air quality. • Natural England is currently undertaking a review of the Surrey Hills National Landscape boundary which is expected to increase the extent of it within GBC. This may have consequential impacts that would need to be addressed as part of the update to the LPSS.

	Matters to consider	Agree / Disagree / Other	Extent to which the local plan meets this requirement
	<p>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>	-	

	Matters to consider	Agree / Disagree / Other	Extent to which the local plan meets this requirement
A10.	<p>No new sites have become available since the finalisation of the adopted local plan which require the spatial strategy to be re-evaluated.</p> <p>PROMPT:</p> <p>Consider if there have been any new sites that have become available, particularly those within public ownership which, if they were to come forward for development, could have an impact on the spatial strategy or could result in loss of employment and would have a significant effect on the quality of place if no new use were found for them.</p> <p>Consider whether any sites which have now become available within your area or neighbouring areas could contribute towards meeting any previously identified unmet needs.</p>	Agree	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <ul style="list-style-type: none"> • There has been some windfall development in Guildford town centre and the inset villages however they accord with the LPSS spatial strategy. The number of additional homes gained has compensated for the delays to the strategic sites with more now anticipated to deliver post the plan period.

	Matters to consider	Agree / Disagree / Other	Extent to which the local plan meets this requirement
A11.	<p>Key planned infrastructure projects critical to plan delivery are on track and have not stalled / failed and there are no new major infrastructure programmes with implications for the growth / spatial strategy set out in the plan.</p> <p>PROMPT:</p> <p>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</p>	Mainly agree	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <ul style="list-style-type: none"> • Relocation of the Sewage Treatment Works to facilitate the delivery of WUV is on track • The need for new secondary schools is being assessed by SCC however the LPSS provides for this re-assessment. • The Ash Road Bridge is under construction. • See above (A8) regarding the cancellation of the A3 scheme and commencement of the A3/M25 Junction 10 improvements

	Matters to consider	Agree / Disagree / Other	Extent to which the local plan meets this requirement
	upon the delivery of key planned infrastructure, and if so, will this impact upon the delivery of the Local Plan.	-	

	Matters to consider	Agree / Disagree / Other	Extent to which the local plan meets this requirement
A12.	<p>All policies in the plan are achievable and effective including for the purpose of decision-making.</p> <p>PROMPT:</p> <p>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>	Agree	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <ul style="list-style-type: none"> • LPSS contains mainly strategic policies • The LPDMP provides further clarity/detail • The policies have been found to be robust through the appeal process over the last 5 years with a high success rate. • The new plan-making system proposes to introduce a set of national development policies which must not be replicated by local DM policies.

	Matters to consider	Agree / Disagree / Other	Extent to which the local plan meets this requirement
A13.	<p>There are no recent or forthcoming changes to another authority’s development plan or planning context which would have a material impact on your plan / planning context for the area covered by your local plan.</p> <p>PROMPT:</p> <p>In making this assessment you may wish to:</p> <ul style="list-style-type: none"> ● Review emerging and adopted neighbouring authority development plans and their planning context. ● Review any emerging and adopted higher level strategic plans including, where relevant, mayoral/ combined authority Spatial Development Strategies e.g. The London Plan. ● Review any relevant neighbourhood plans ● Consider whether any of the matters highlighted in statements A1- A12 for their plan may impact on 	Agree	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <ul style="list-style-type: none"> ● In terms of LPAs within our immediate housing market area – both have reviewed their strategic plans and concluded that new updated Local Plans should be prepared. Both authorities have a local housing need figure through the standard method that is higher than that adopted in their most recent strategic plans.

	Matters to consider	Agree / Disagree / Other	Extent to which the local plan meets this requirement
	<p>your plan - discuss this with the relevant authorities.</p> <ul style="list-style-type: none"> ● 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 / Other	Extent to which the local plan meets this requirement
A14.	<p>There are no local political changes or a revised / new corporate strategy which would require a change to the approach set out in the current plan.</p> <p>PROMPT:</p> <p>In making this assessment you may wish to:</p> <ul style="list-style-type: none"> ● Review any manifesto commitments and review the corporate and business plan. ● Engage with your senior management team and undertake appropriate engagement with senior politicians in your authority. ● Consider other plans or strategies being produced across the Council or by partners which may impact on the appropriateness of your current plan and the strategy that underpins it, for instance, Growth Deals, economic growth plans, local industrial strategies produced by the Local Economic Partnership, housing/ regeneration 	To be explored further	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <ul style="list-style-type: none"> ● Renewed emphasis regarding exploring the potential development opportunities on brownfield land and progress with a flood alleviation scheme to unlock future growth in the town centre.

	Matters to consider	Agree / Disagree / Other	Extent to which the local plan meets this requirement
	strategies and so on.		

	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><u>If no</u> go to question A16.</p> <p><u>If yes</u>, 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</p>

			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 <u>why</u> an update to plan policies is necessary in section A17 below and complete Section B below.
A17.	<p><u>Decision:</u> 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): See Section 7 of the committee report</p> <p>Other actions that may be required in addition to or in place of an update of plan policies: None</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.	Unsure	Whilst the current standard method result for Guildford borough is significantly higher than the LPSS housing requirement, an update to the standard method by Government is anticipated in 2025. We cannot be sure what the new standard method figure will be for Guildford borough, nor whether there are exceptional circumstances that could justify a different figure, or alternatively that the new standard method figure cannot be met locally. This would need to be tested through examination.
B2	The growth strategy and / or spatial distribution of growth set out in the current plan is not fit for purpose and your policies update is likely to involve a change to this.	No	The spatial strategy based on the spatial hierarchy remains robust in terms of directing development to the most sustainable locations in the first instance.
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.	Unsure	All LPSS sites that have not yet been commenced will need to be reassessed as part of the update process and meet the requirements for inclusion within the new Local Plan.
	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.

	<p>You have said no to <u>all</u> questions (B1 to B3) above</p>		<p>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.</p>
<p>B4</p>	<p>Decision: Full Update of Plan Policies</p> <p>Reasons for scope of review: The Government intends to implement planning reform which will alter plan-making requirements and ‘new style’ plans will be necessary from autumn 2024. This changed context weighs in favour of a full update to the LPSS (in the form of a ‘new style’ Local Plan). It is considered prudent to set the scope of any update (or new style plan) in the context of confirmed emerging updates to national legislation, policy, and guidance as it relates to plan-making.</p>		
<p>Date of assessment:</p>	<p>12 January 2024</p>		