

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

	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.	Disagree	<p>The adopted plan was prepared and examined against the 2012 version of the NPPF; submission in 2017 pre-dated publication of current NPPF, PPG updates and NDG / NMDC (albeit some principles are reflected). Although the broad direction of national policy remains similar, we need to demonstrate that policies have been considered against the latest version of the NPPF.</p> <p>Under the Levelling Up & Regeneration Act, the Government is expected to publish nationally-set Development Management policies which should then not be repeated in Local Plans.</p>
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	<p>The current plan contains a locally derived and objectively assessed need as opposed to Local Housing Need.</p> <p>There is some similarity in the figures particularly in latter years of the plan.</p> <p>Plan and associated housing targets currently have ~7.5 years left to run compared to NPPF advice of 10-15 year headroom.</p>
A3.	You have a 5-year supply of housing land	Disagree	<p>The Plan was considered 'recently adopted' until 31 October 2023. The protection of having a 5yhls has now ended and we are now unable to demonstrate a sufficient supply beyond this date.</p> <p>The anticipated revised NPPF may remove the requirement for a 5YHLS, however, to date the revision has not been published.</p>
A4.	You are meeting housing delivery targets	Agree	<p>Yes, the Council is meeting its HDT targets. The revised HDT shows 124% delivery rate.</p>

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A5.	Your plan policies are on track to deliver other plan objectives including any (i) affordable housing targets including requirements for First Homes; and (ii) commercial floorspace/jobs targets over the remaining plan period.	Agree/ Disagree	<p>(i) Affordable housing targets including requirements for First Homes</p> <p>Whilst we are on track to meet affordable housing requirements through development, viability is increasingly becoming an issue and may impact upon our ability to continue to deliver at the anticipated rate. The SHMA supporting the Local Plan was completed in 2016/17 and there have been changes in affordability and the wider economy. The Plan does not contain requirements for First Homes.</p> <p>(ii) Commercial floorspace/jobs targets over the remaining plan period</p> <p>Commercial and retail requirements pre-date Covid-19 and are now unrealistic / unrepresentative.</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>There have been some significant changes in economic conditions that will need to be considered.</p> <p>The Plan targets and evidence pre-date the Covid-19 pandemic. The commercial and retail strategies, in particular, are out of date on this basis.</p> <p>In addition, there have been the recent changes to the use classes order that allows for commercial premises (business and retail) to change to housing without the need for planning permission.</p>
A7.	There have been no significant changes affecting viability of planned development.	Disagree	<p>North Herts is still, generally speaking, a high-value and buoyant market. However, even since adoption of the Local Plan, economic circumstances have changed – we need to understand how those changes may have impacted on allocations and policy flexibility in the Local Plan.</p>

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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.	Disagree	<p>There have been delays in the delivery of key sites. Last housing delivery information was submitted to the Examination in August 2020 and was predicated on a relatively speedy resolution. The Plan was adopted more than two years later (November 2022). Given that all key, strategic allocations required release from the Green Belt this has had an impact.</p> <p>Site allocations in the Local Plan are undergoing more detailed analysis for master(planning) is impacting upon dwelling and delivery estimates, identified constraints and infrastructure requirements in some cases.</p>
A9.	There have been no significant changes to the local environmental or heritage context which have implications for the local plan approach or policies.	Agree / Disagree	<p>No significant impacts. We have had minor Conservation Area revisions and adjustments to SSSI impact areas but not likely to substantively impact upon outcomes.</p> <p>However, SEA indicators are based on those first identified in 2005, there would be an opportunity to review and revise and possibly make these more relevant to reflect the differences that have happened environmentally and economically.</p> <p>The Environment Act has introduced new requirements in relation to Biodiversity Net Gain and Local Nature Recovery Strategies which should be reflected in an appropriate set of objectives, policies and allocations</p>
A10.	No new sites have become available since the finalisation of the adopted local plan which require the spatial strategy to be re-evaluated.	Agree	Some windfall sites have come forward but not in sufficient quantity to substantively undermine or reevaluate the strategy
A11.	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.	Agree/ Disagree	Government has halted the roll-out of SMART motorway expansions. A1(M) J6-8 was identified and relied upon in the examination of the Plan though HCC as highway authority have been conducting transport modelling on the assumption this scheme will not happen for some time.

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A12.	All policies in the plan are achievable and effective including for the purpose of decision-making.	Disagree	<p>There have not been any major 'overturns' of policy approach at appeal.</p> <p>However, there are some issues that are arising which are not covered by policies in the Local Plan or which now 'lag behind' current thinking or legislation i.e. Climate change emergency, Biodiversity Net Gain etc. An update would benefit the effectiveness of these policies.</p>
A13.	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.	Disagree	<p>Key neighbours' Plans are due for review in a similar timescale including Luton, Central Bedfordshire and Stevenage.</p> <p>These are presently at an early stage of consideration and have not identified significant issues yet but Stevenage and Luton in particular are known to be constrained authorities and required the assistance of North Hertfordshire to meet development needs in the last round of plan-making.</p>
A14.	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.	Disagree	<p>The Council has declared a Climate Change Emergency (2019) and an Ecological Emergency (2023). Our Council Plan and Climate Change Strategy were both update in 2022.</p> <p>More broadly the Covid-19 pandemic and recent policy changes have placed an increased emphasis on health & wellbeing, active travel, access to green space and the role of the planning system in facilitating these.</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	
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	
A17.	<p><u>Decision:</u> Update plan policies</p> <ul style="list-style-type: none"> • Changes in the environmental context including the Council’s declaration of climate emergency and the requirement for biodiversity net gain. • A number of the development management policies will also need clarification and updating to reflect changes in national policy/local changes, including the requirement to draw up design codes and guidance. • The need to maximise opportunities for jobs growth and to take account of changing economic circumstances. • The ongoing requirement to address affordable housing need. • The potential requirement to identify new sites for development to ensure that the Council can demonstrate a five-year housing land supply. 		

	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	Linked as much to the need to extend time horizon of plan as to the numbers themselves.
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	Commercial policies pre-date Covid-19.
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	Plan needs to be reconciled against, in particular, Climate Change emergency as well as other policy priorities and statutory obligations that have developed since current plan was written.
			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.
B4	<p><u>Decision:</u> Full Update of Plan Policies</p> <p>A full update will also allow the Council to give greater emphasis to climate change mitigation and adaptation and to design quality.</p> <p>It is recommended that decisions on the final scope of the review and its associated timetable should be made when the implications of the proposed changes to the NPPF are better understood, and secondary legislation and guidance accompanying the Levelling-up and Regeneration Act has been approved.</p>		