

## **Report to Council**

**Subject:** Implications of the revised National Planning Policy Framework (NPPF) for local plan preparation and approval of revised Local Development Scheme (LDS)

**Date:** 5<sup>th</sup> March 2025

**Author:** Director of Place

### **Purpose**

The purpose of this report is to inform members of the revised NPPF published on 12th December 2024 and seek approval to withdraw from the preparation of the Greater Nottingham Strategic Plan and instead commence the preparation of the Gedling Local Development Plan, to replace the Aligned Core Strategy which was adopted in September 2014 and the Local Planning Document which was adopted in July 2018.

### **Recommendation(s)**

**THAT:**

- 1) That Council notes the summary of changes to the NPPF arising from the publication of the revised NPPF on 12<sup>th</sup> December 2024 appended to this report as Appendix 1.**
- 2) That Council approves withdrawal from the preparation of the Greater Nottingham Strategic Plan and to commence the preparation of the Gedling Local Development Plan which will cover strategic and non-strategic matters.**
- 3) That Council approves the revised Local Development Scheme (LDS) appended to this report as Appendix 2.**

## 1 Background

- 1.1 On 10th January 2019 members were asked to note the intention to commence a review of the Local Plan, commencing with the review of the Core Strategy. Subsequent reports to Cabinet have sought approval to consult on the Growth Options, Preferred Approach documents and the Publication Draft document.
- 1.2 Strategic policies for the Greater Nottingham area are currently set out in the adopted Core Strategies for the Greater Nottingham authorities (Broxtowe Borough, Gedling Borough and Nottingham City Councils, adopted in September 2014; the adopted Core Strategy for Erewash Borough Council, adopted in March 2014; and the adopted Core Strategy for Rushcliffe Borough Council, adopted in December 2014). Collectively these are referred to as the Aligned Core Strategies, as the policy framework within them is consistent, they are based on a common evidence base, collectively they meet the full objectively assessed need for housing and other development, and they cover the same plan period. Together they provide a consistent and coherent strategic spatial planning framework for the Nottingham Core (Greater Nottingham) Housing Market Area.
- 1.3 The Aligned Core Strategy was adopted in September 2014 and forms Part 1 of the Gedling Local Plan, providing the strategic context for the Part 2 Local Planning Document (adopted in 2018). It sets out the strategic policy direction for future development in the Borough up to 2028. There is, however, a legal requirement to review local plans every five years. Gedling Borough Council has been preparing the Greater Nottingham Strategic Plan (GNSP) in conjunction with Broxtowe Borough, Nottingham City and Rushcliffe Borough Councils. Several consultation exercises have been undertaken to date, on the Growth Options document (in July 2020 and February 2021), the Preferred Approach (January/February 2023 and Autumn 2023) and the full Publication Draft plan (November/December 2024).
- 1.4 Preparation of the GNSP has taken place in the context of the NPPF, which sets out the government's planning policies for England and how these are expected to be applied. A draft revised NPPF was consulted on in 2024 and comments were submitted in advance of the deadline of 24th September 2024. The consultation proposed a wide range of changes with the aim of ensuring the planning system delivers sustained economic growth. Amongst these changes were making the standard method for assessing housing needs mandatory in order to deliver the Government's commitment to build 1.5 million new homes. In relation to plan making, draft transitional arrangements allowed for local plans that were published within one month of the publication of the new NPPF and where the emerging annual housing requirement was 200 dwellings or fewer below

the published relevant Local Housing Need figure (derived from a draft new methodology), to be examined under the 2023 NPPF. The publication draft GNSP was progressed on the basis of meeting these draft transitional arrangements.

- 1.5 The revised NPPF was published on 12th December 2024. The policy changes continue to reflect the government's commitment to radically boosting the supply of housing, while delivering homes and places that are high quality and genuinely affordable. The plan-led approach continues to be the cornerstone of the planning system. The changes are wide ranging and far reaching and are summarised in the note attached as **Appendix 1**.
- 1.6 However, other changes include revisions to the transitional arrangements which increased the number of homes needed to be identified on non-strategic sites which mean that the approach taken by the Publication Draft GNSP no longer complies and further work would need to be undertaken. The certainty provided by the publication of the revised NPPF has provided an opportunity to review the Council's approach to plan preparation before committing to the cost of the examination stage.
- 1.7 Continuing to progress the GNSP would achieve only 80% of the Council's housing need, calculated using the new standard method, which equates to 478 dwellings per annum. The draft plan identifies additional land at the strategic allocation at Top Wighay Farm but would require further non-strategic allocations to be identified through future plan preparation to meet the housing target set by the revised standard method. It is estimated that the full suite of allocations would not be confirmed until 2029/2030 through this route.
- 1.8 The Council now has an opportunity to review its approach to plan preparation and produce a single local plan for the Council which meets the standard method in full (609 dwellings per annum). Whilst the plan preparation process would need to recommence, only one plan would be prepared which would identify both strategic and non-strategic sites to meet the Council's housing need in full. To accord with the NPPF, this plan would need to be submitted for examination by 12th December 2026, with adoption anticipated by late 2027.

## **2 Proposal**

- 2.1 Progressing a single local plan for Gedling Borough enables the new standard method housing figure to be met in full at an earlier opportunity than would be achieved by progressing the GNSP and a subsequent plan. This approach will therefore have the benefit of delivering more housing more quickly, thereby meeting the needs of residents including those in need of affordable housing. It is acknowledged that timescales are extremely challenging, given the need to prepare additional evidence and

identify sites to meet the housing target. However, the advanced stage of preparation of the GNSP provides a good starting point for the new local plan and the additional work required would be needed in any event through a review of the part 2 local plan.

- 2.2 A collaborative approach with the Greater Nottingham Planning Partnership will continue, through attendance at Joint Planning Advisory Board meetings and continued use of the shared evidence base in agreement with the Greater Nottingham Partnership as well as the consistent policies that have been agreed through the preparation of the GNSP.
- 2.3 The Council is required to prepare and maintain a Local Development Scheme to set out the timetable for preparing the Council's Local Plan. The existing Local Development Scheme was prepared in January 2024 and covers the preparation of the Greater Nottingham Strategic Plan and also refers to the separate review of the part 2 local plan. Previous Local Development Schemes related to the preparation of the Aligned Core Strategy and Local Planning Document.
- 2.4 Given the intention to now prepare a single local plan for Gedling Borough, the Local Development Scheme has been updated and is attached as **Appendix 2**. The timetable and milestones for the preparation of the local plan enable the plan to be submitted for examination by 12th December 2026, being the deadline set by the NPPF. The revised Local Development Scheme will be made available on the Council's website. It is noted that there is an opportunity to apply for grant funding to support local authorities to implement the required policy changes arising from the revised NPPF. One of the funding requirements is that the councils in receipt of funding should ensure that their Local Development Scheme is updated and shared with MHCLG within 12 weeks of the publication of the revised NPPF, i.e. by 6th March 2025.

### **3 Alternative Options**

- 3.1 One alternative option would be not to review the Aligned Core Strategy and Local Planning Document, but there is a statutory requirement to prepare a Local Plan and to review it every five years. An out-of-date plan and policies would make the Council vulnerable to speculative planning applications as applications would be determined in accordance with the National Planning Policy Framework and its default presumption in favour of sustainable development
- 3.2 Another alternative would be to continue with the Greater Nottingham Strategic Plan. Whilst it is recognised that there are significant advantages of a comprehensive approach to strategic planning across the whole of the Greater Nottingham area, ensuring a consistent planning policy approach

across the wider area, plan preparation can progress more quickly through preparing a single local plan for Gedling Borough enabling sites to be identified to meet the standard method housing figure in full with an adopted plan including both strategic and non strategic sites anticipated by late 2027.

- 3.3 A further alternative is to pause progress on the Greater Nottingham Strategic Plan and for a Spatial Development Strategy to be prepared by the Combined Authority. However, for Spatial Development Strategies, paragraph 23 of the NPPF states that allocations and land use designations can only be included where the power to make allocations has been conferred which does not apply to the East Midlands Combined County Authority. As such, preparation of a Spatial Development Strategy would not enable Gedling Borough Council to allocate land to meet its housing target.
- 3.4 One alternative option in relation to the Local Development Scheme is not to specify a date upon which the revised document will come into effect. The production and bringing into effect of a Local Development Scheme is a statutory requirement and the existing document is out of date as it relates to the Greater Nottingham Strategic Plan.

#### **4 Financial Implications**

- 4.1 The cost of the preparation of a single local plan for Gedling Borough will be met from existing resources. Evidence studies which have been commissioned jointly with the Greater Nottingham Partnership will continue to inform the drafting of the Gedling Local Development Plan. Any additional evidence studies to support the GLDP will have arisen due to the requirements of the NPPF and will be undertaken either jointly with the Greater Nottingham Partnership or individually by the Council dependent on the nature of the study. This would have been the case regardless of whether the Council had continued with the GNSP. There is an opportunity to apply for funding to support local plan delivery and Green Belt reviews. There will be costs associated with subsequent stages of preparation including the examination stage. However, there will only be the requirement for one local plan inquiry as there will be no need to progress a further plan to meet the Council's development needs for this plan period.
- 4.2 Additional costs will be incurred through the need to amend the current licence contract that the Council has with the other partner Councils and Inovem in respect to the licence for use of the Inovem Consult software and to collect store and process consultation responses. The partner Councils have accepted and agree to the change to the partnership agreement. The current licence expires in March 2026 and the Council will require a new licence in advance of the Issues and Options consultation which is anticipated July 2025. The total cost excluding VAT is £16,412.

Funding for this has been set aside in the Local Plan Reserve. There are no financial implications relating to the approval of the Local Development Scheme.

## **5 Legal Implications**

- 5.1 It is a legal requirement of local planning authorities that they exercise their plan making functions (under s.39(2) of the Planning and Compulsory Purchase Act 2004). There is also a legal requirement to review local plans every five years (Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012) and this is reflected in the National Planning Policy Framework (NPPF).
- 5.2 The Council is required by S.15 of the Planning and Compulsory Purchase Act to prepare and maintain a Local Development Scheme to set out the timetable for preparing the Council's local plan. Revisions to the transitional arrangements in the NPPF in December 2024 resulted in the approach within the GNSP no longer complying and further work needed to be undertaken. The revised Local Development Scheme subject to approval by Cabinet reflects this new approach of progressing a single local plan.

## **6 Equalities Implications**

- 6.1 The preparation of a local plan is subject to consultation with a wide range of stakeholders and the Council will consult with groups representing people with protected characteristics. An Equalities Impact Assessment will be progressed in tandem with the emerging local plan as part of an iterative process that assesses more comprehensive and detailed policies and recommends changes through the Plan's preparation.
- 6.2 Consultation on the local plan will be undertaken in accordance with the Council's Statement of Community Involvement. Appendix 1 of the Statement of Community Involvement sets out stages of preparation of a development plan document and states that the Council will engage with stakeholders and the community through the pre-submission stage using a variety of methods. A key factor is ensuring that the consultation is accessible to all and that equalities implications are given full consideration.

## **7 Carbon Reduction/Environmental Sustainability Implications**

- 7.1 Sustainability Appraisal is a legal requirement of plan preparation in order to consider economic, social and environmental objectives. A Sustainability Appraisal Report will be prepared to fulfil the requirements of the Planning and Compulsory Purchase Act (2004), and the requirements of the EU Strategic Environmental Assessment Directive transposed in the UK by the Environmental Assessment of Plans and Programmes Regulations 2004.

## **8 Appendices**

Appendix 1 Summary of changes to the NPPF

Appendix 2 Revised Local Development Scheme

## **9 Background Papers**

Background Paper 1 – [revised NPPF](#) (12th December 2024)

The following documents are available at

<https://www.gedling.gov.uk/resident/planningandbuildingcontrol/planningpolicy>

- Aligned Core Strategy (September 2014)
- Gedling Borough Council Local Planning Document, July 2018
- Statement of Community Involvement, September 2019

### **Statutory Officer approval**

**Approved by:**

**Date:**

**On behalf of the Chief Financial Officer**

**Approved by:**

**Date:**

**On behalf of the Monitoring Officer**