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Head of Regeneration**

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**Direct Line:  
Reply to: David Clarke  
Our Ref:**

Dear Mr. Collison,

Subsequent to the close of the Regulation 16 consultation on the Denstone Neighbourhood Plan (on 18 December 2023), Government published a revised National Planning Policy Framework (NPPF) on 20 December 2023. The revised NPPF is effective immediately.

The revised NPPF includes transitional arrangements for Local Plans, but not for Neighbourhood Plans. The inference from this is that the revised NPPF applies immediately in relation plan-making for Neighbourhood Plans.

In light of the above, Borough Council officers are grateful for the opportunity to comment on whether the Denstone Neighbourhood Plan meets the Basic Condition having regard to national policies set out in the revised NPPF.

As a general comment, we consider that most of the revisions to NPPF (such as flexibility for local authorities in relation to calculating local housing need, no requirement to review Green Belt boundaries, optimising site densities, removal of requirement to demonstrate a five-year housing supply where there is an up to date Local Plan, emphasis on beautiful places, support for community-led housing development and self / custom-build housing) are not directly relevant to the updated Denstone Neighbourhood Plan.

We do, however, consider that the following revisions to NPPF are relevant to the updated Denstone Neighbourhood Plan and whether it has regard to national policy:

1. Paragraph 14 of the revised NPPF increases the level of protection afforded to neighbourhood plans in circumstances where a Local Plan is deemed out of date, from two to five years post adoption, provided that the Neighbourhood Plan contains policies and at least one housing allocation to meet its identified housing requirement.
2. Footnote 62 (related to paragraph 181) of the revised NPPF includes new wording. In addition to “where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality”, footnote 62 now adds “The availability of agricultural land used for food production should be considered, alongside the other policies in this Framework, when deciding what sites are most appropriate for development.”



In light of the above it is considered that Part 3 of Policy PE3, which proposes that development should not lead to the loss of best and most versatile agricultural land (BMVAL), should include some flexibility to take account of other factors if it is to have regard to the revised NPPF.

It is hoped that our comments are helpful towards considering whether the updated Denstone Neighbourhood Plan has regard to national policies in the revised NPPF.

Yours sincerely,

David Clarke

Senior Planning Officer