



Shropshire Council
Legal and Democratic Services
Shirehall
Abbey Foregate
Shrewsbury
SY2 6ND

Date: Tuesday, 21 February 2023

**Committee:
Cabinet**

Date: Wednesday, 1 March 2023

Time: 2.00 pm

Venue: Shrewsbury/Oswestry Room, Shirehall, Abbey Foregate, Shrewsbury, Shropshire, SY2 6ND

You are requested to attend the above meeting. The Agenda is attached

There will be some access to the meeting room for members of the press and public, but this will be limited. If you wish to attend the meeting please email democracy@shropshire.gov.uk to check that a seat will be available for you.

Please click [here](#) to view the livestream of the meeting on the date and time stated on the agenda

The recording of the event will also be made available shortly after the meeting on the Shropshire Council Youtube Channel [Here](#)

Tim Collard Assistant Director - Legal and Governance

Members of Cabinet

Cecilia Motley

Ian Nellins

Lezley Picton (Leader)

Gwilym Butler

Dean Carroll

Rob Gittins

Kirstie Hurst-Knight

Richard Marshall

Your Committee Officer is:

Amanda Holyoak Committee Services Supervisor

Tel: 01743 257714

Email: amanda.holyoak@shropshire.gov.uk



AGENDA

1 Apologies for Absence

2 Disclosable Interests

Members are reminded that they must declare their disclosable pecuniary interests and other registrable or non-registrable interests in any matter being considered at the meeting as set out in Appendix B of the Members' Code of Conduct and consider if they should leave the room prior to the item being considered. Further advice can be sought from the Monitoring Officer in advance of the meeting.

3 Minutes (Pages 1 - 10)

To confirm the minutes of the meeting held on 15 February 2023.

4 Public Question Time

To receive any questions from members of the public, notice of which has been given in accordance with Procedure Rule 14. Deadline for notification is not later than 5.00 pm on Thursday 23 February 2023.

5 Member Question Time

To receive any questions from Members of the Council. Deadline for notification is not later than 5.00 pm on Thursday 23 February 2023.

6 Scrutiny Items

7 Levelling-Up and Regeneration Bill: Reforms to National Planning Policy Consultation (Pages 11 - 42)

Lead Member – Councillor Richard Marshall – Portfolio Holder for Highways and Regulatory Services

Report of Mark Barrow – Executive Director of Place

8 Shropshire LCWIP Consultation

Councillor Ian Nellins – Deputy Leader - Portfolio Holder for Climate Change, Environment and Transport

Report of Mark Barrow – Executive Director of Place

Report to follow



Committee and Date

Cabinet

1st March 2023

CABINET

Minutes of the meeting held on 15 February 2023

In the Shrewsbury Room, Shirehall, Abbey Foregate, Shrewsbury, Shropshire, SY2 6ND

10.30 am

Responsible Officer: Amanda Holyoak

Email: amanda.holyoak@shropshire.gov.uk Tel: 01743 257714

Present

Councillor Lezley Picton (Chairman)

Councillors Cecilia Motley, Ian Nellins, Gwilym Butler, Dean Carroll, Rob Gittins, Kirstie Hurst-Knight and Richard Marshall

128 Apologies for Absence

There were no apologies.

129 Disclosable Interests

None were declared.

130 Minutes

RESOLVED:

That the minutes of the meeting held on 18th January 2023 be confirmed as a correct record.

131 Public Question Time

A public question was received from Sally Stote regarding Shirehall.

The full question and the response provided by the Portfolio Holder for Growth, Regeneration and Housing are attached to the webpage for the meeting: [Agenda for Cabinet on Wednesday, 15th February, 2023, 10.30 am — Shropshire Council](#)

132 Member Question Time

Questions were received from the following Members. The full question and responses provided are attached to the webpage for the meeting. [Agenda for Cabinet on Wednesday, 15th February, 2023, 10.30 am — Shropshire Council](#)

Councillor Alex Wagner – in relation to street furniture in Shrewsbury.

Councillor Rosemary Dartnall – in relation to street lighting. In response to a supplementary question the Portfolio Holder for Highways and Regulatory Services understood the frustrations with clusters of lights being out; however this was due to them being fitted at similar time. He provided reassurance that residential areas were being prioritised on the work programme. In relation to repairs, it was confirmed that any replacements would be fitted with improved technology lights.

Councillor Julia Buckley – in relation to the care home fee uplift. In response to a supplementary question, the Portfolio Holder for Adult Social Care, Public Health and Communities confirmed that the uplift would be discussed with providers before being made public.

Councillor Rob Wilson (read by Councillor Roger Evans) – in relation to Local Transport Plans..In response to a supplementary question relating to the 2021 – 2026 Shropshire Local Development Framework, the Portfolio Holder for Highways and Regulatory Services referred Members to the first paragraph of his previous answer.

133 **Scrutiny Items**

Chair of the People Overview Committee, Councillor Peggy Mullock, sought support from Cabinet to investigate the gap in provision of psychological and emotional support for exploited children, resulting in a waiting list for assessments. Members were advised that Health had no data on the timeframe for support for exploited children and that the committee had made a recommendation for the number of children currently awaiting assessment to be provided as soon as possible.

The Leader confirmed that, together with the Portfolio Holder for Adult Social Care, Public Health and Communities, this issue would be raised with colleagues in the ICS.

134 **Financial Monitoring Report Quarter 3 2022/23**

The Portfolio Holder for Finance and Corporate Resources presented the report which estimated the Council's year end position based on information over the period 1st April 2022 to 31st December 2022. It was noted that the Council's projected financial position at Quarter 3 is still demonstrating a challenging position with ongoing cost pressures in Adult Social Care and Children's Social Care alongside the impact of inflation.

Concern was raised regarding unachieved savings in the Place directorate and the level of reserves. Members were advised that the predicted funds at the end of the next financial year were back up to £40million.

Members discussed the fair funding review; however members were advised that Cabinet had not relied on government funding to support the budget.

RESOLVED:

That Members:

- A. Noted that at the end of Quarter 3 (31st December 2022), the full year revenue forecast is a potential overspend of between £4.138m and £17.506m, with best estimates indicating an overall overspend of £9.950m;
- B. Considered the detrimental impact of this on the Council's General Fund balance and mitigating actions urgently required to avoid this.

135 Treasury Management Update Quarter 3 2022/23

The Portfolio Holder for Finance and Corporate Resources presented the report which outlined the treasury management activities of the Council in the third quarter of 2022/23. It outlined the economic background against which decisions have been made. It also provided an update on the performance of the treasury management function.

RESOLVED:

That members discussed and noted the position as set out in the report, in particular the continued compliance with the prudential indicators and the treasury management strategy.

136 Financial Strategy 2023/24 - 2027/28 - Final

The Portfolio Holder for Finance and Corporate Resources presented the report which provided an update on the Medium Term Financial Strategy which showed a much improved outlook for the medium term; however it was noted that the next twelve months were crucial and delivery is key. It was noted that the charge for waste collection and green waste could be removed, but this would be confirmed at full Council.

Concerns were raised that services affecting vulnerable people would be cut. It was confirmed that statutory services would not be affected and a request for clarity surrounding transport for excluded young people was received.

Members discussed alternative budget proposals, and it was felt that although there were some good ideas put forward, they had focussed on capital and had not addressed the deficit of £51million.

RESOLVED:

- That Cabinet considered the MTFs and, subject to any amendment, recommended the 2023/24 budget of £645.741m outlined in the Budget Book at Appendix 3, to full Council for discussion and approval.
- That Cabinet discussed the key changes since the December update of the MTFs and the advice relating to those changes, in particular
 - The public consultation and early results from that
 - The Alternative Budget process and its outcomes
 - The Financial Settlement and the outcomes for this Council
 - The Collection Fund outturn and the impact on next year

- The latest budget forecast for the current year, the deterioration in the outlook, and the resulting likely impact on reserves in this year and next (also included in the MTFS assumptions)
- That Cabinet noted that the Council papers will include the full budget report including all proposals to achieve the estimated MTFS position, but that some of those proposals will require further specific member approval, and possible consultation.
- Agreed the adoption of the Capital Strategy 2022/23 – 2027/28 attached as Appendix 2.
- That Cabinet noted that the budget report for Council will include the council tax resolution and the relevant decisions to be made in setting that.

137 Estimated Collection Fund Outturn For 2022/2023

The Portfolio Holder for Finance and Corporate Resources presented the report and Members noted that the Council expects good collection rates for council tax and business rates in 2022/23, exceeding our estimates by £4.3m. This reflects strong financial resilience locally (despite pressures of the high cost of living) and high performance by the collections team.

Members thanked the Executive Director of Health for her team's work in contacting over 5,000 residents to offer support. Members urged residents who were struggling financially to contact the Council.

RESOLVED:

That Members:

- Noted the overall Collection Fund estimated surplus of £6.841m for the year ending 31st March 2023, comprised of an estimated surplus of £2.836m for Council Tax and an estimated surplus of £4.005m for Non-Domestic Rates (NDR).
- Noted the estimated surplus/deficit incorporates the final year of the three year phasing of the 2020/21 in year deficit.
- Noted the distribution of the Collection Fund estimated surplus for Council Tax and NDR to the major/relevant precepting authorities and the Secretary of State.
- Noted Shropshire Council's share of the overall estimated surplus of £4.313m, comprised of an estimated surplus of £2.331m for Council Tax and an estimated surplus of £1.982m for NDR, and how this will be applied to improve the council's overall financial sustainability and resilience.
- Noted the inclusion of Shropshire Council's share of the overall estimated surplus for Council Tax and NDR in the 2023/24 budget.

138 Treasury Strategy 2023/24

The Portfolio Holder for Finance and Corporate Resources presented the report which proposed the Treasury Strategy for 2023/24. It set out the arrangements for how the council will appropriately manage its arrangements for banking, cash flow management, investments, and borrowing, supporting the delivery of the MTFs and The Shropshire Plan.

RESOLVED:

That Cabinet

- Received the Treasury Strategy 2023/24 and recommended its adoption to Council from the perspective of this setting out the policy Cabinet wish to adopt;
- Recommends that Council:-
 - a) Approve, with any comments, the Treasury Strategy for 2023/24
 - b) Approve, with any comments, the Prudential Indicators, set out in Appendix 1, in accordance with the Local Government Act 2003, noting that the new Liability Benchmark indicator needs to be finalised.
 - c) Approve, with any comments, the Investment Strategy, set out in Appendix 2 in accordance with the DLUHC Guidance on Local Government Investments.
 - d) Approve, with any comments, the Minimum Revenue Provision (MRP) Policy Statement, set out in Appendix 3.
 - e) Authorise the Section 151 Officer to exercise the borrowing powers contained in Section 3 of the Local Government Act 2003 and to manage the Council's debt portfolio in accordance with the Treasury Strategy.
 - f) Authorise the Section 151 Officer to use other Foreign Banks which meet Link's creditworthiness policy as required.
 - g) Authorise the Section 151 Officer to progress and finalise the restatement and amendment of Cornovii Development Ltd loan agreements.

139 Fees and Charges 2023/24

The Portfolio Holder for Finance and Corporate Resources introduced the report which presented the budgeted income to be received and proposed the level of fees and charges to be applied by Shropshire Council in 2023/24.

It was noted that the report contained a charge for road closures and that this had yet to be agreed. It was confirmed that this would be removed from the report which was being taken to full Council.

RESOLVED:

That Cabinet members discussed the proposed fees and charges and recommended Full Council to –

- Note the breakdown of the total income for 2022/23 and 2023/24 and in particular that the proposed 2023/24 charges for discretionary services represent £45.052m of the £86.918m of income derived from Fees and Charges.
- Approve the charges for 2023/24 as detailed in Appendix 3 to be implemented from 1 April 2023.
- Note that as previously agreed, any changes to fees and charges proposed by Shropshire Community Leisure Trust Ltd. in relation to the outsourced leisure facilities will only be referred to Cabinet and Council for approval if the proposed increases exceed Consumer Price Index (CPI) for the preceding November.
- Revise housing rents as follows (subject to restrictions or exemptions identified in the Welfare Reform and Work Bill):
 - i. Social Housing rents for 2023/24 are increased by 7% from 3rd April 2023.
 - ii. Affordable rents for 2023/24 are increased by 7% from 3rd April 2023
 - iii. Shared Ownership rents continue to be set at 2.75% of the outstanding capital value of the home at the time of sale and thereafter increased each April in accordance with the terms specified in the lease agreements. For 2023/24 the increase is capped at 7% in line with the cap imposed on social housing rents.
 - iv. Service charges continue to be set based on actual cost.

140 Performance Monitoring Report Quarter 3 2022/23

The Portfolio Holder for Culture and Digital presented the Q3 performance report, which showed continued progress in the development of a Performance Management Framework to reflect The Shropshire Plan outcomes: Healthy People, Healthy Economy, Healthy Environment and a Healthy Organisation.

Members noted the increase in the number of looked after children but congratulated the team in the increase in the number of foster carers. The importance of promoting fostering opportunities was expressed.

Concern was raised that certain KPIs had been omitted from the report and a request for an update on the Homelessness Strategy was requested. Members were advised that all data was available on the portal, however there had been delays in the strategy due to redeployment of resource. Members were reassured that work was ongoing.

RESOLVED:

That Cabinet:

- Considered and endorsed, with appropriate comment, the performance to date
- Considered any issues in this report as set out in paragraph 9.2
- Reviewed both the appendix and performance portal to identify any performance areas that Cabinet would like to consider in greater detail.

141 Determination of Admission Arrangements 2024-25

The Portfolio Holder for Children and Education presented the report which sought Cabinet approval to formally determine the admission arrangements 2024-2025 for Shropshire Council's community and voluntary controlled schools in light of the recommendations of the Local Admissions Forum, and in accordance with the School Admissions Code 2021 and The School Admissions Regulations 2012.

It was noted that no changes to the admission arrangements had been proposed.

RESOLVED:

That Cabinet determined the proposed admission arrangements 2024- 2025 for Shropshire's community and voluntary controlled schools and further approved the publication of the arrangements in accordance with the School Admissions Code 2021 and to the notification of this to parties specified in the Code.

142 Shropshire Schools Funding Formula 2023-24

The Portfolio Holder for Children and Education presented the report which sought approval from Cabinet for the proposed Schools Funding Formula in light of the recommendations of the Schools Forum, and in accordance with the Education and Skills Funding Agency (ESFA) operational guidance on schools revenue funding for the Shropshire schools funding formula for 2023-24.

RESOLVED:

That Cabinet accepts the recommendation of Shropshire Schools Forum on the funding formula for Shropshire schools for the financial year 2023-24 for maintained schools, and the academic year 2023-24 for academies

143 ICT & Digital Strategy

The Portfolio Holder for Culture and Digital presented the ICT and Digital Strategy which brings the previous strategy up to date and aligns with the objectives of The Shropshire Plan (agreed by Council in May 2022). It also takes the lessons we learnt from the pandemic about how the council can harness digital technology to enable quicker, safer, and more transparent communication with residents and local businesses.

Members raised concerns regarding digital inequality. Various options were discussed which would provide a method of payment; be it cash, a Shropshire card (pre-paid card), debit cards or a smartphone app.

Concerns were expressed with regards to cash payments in car parks no longer being accepted. It was felt that there should be a link with tourism as it was not just residents who used the county's car parks and therefore could not use a system such as a Shropshire card. In response, the Portfolio Holder for Highways and Regulatory Services understood these concerns and advised that a full business case would be brought to Cabinet before any changes were made. He also advised that there were on-costs when

using multiple services to take payments, and that there were also other issues with cash payments, such as the capacity of the parking machines and cash collection.

Members were informed that the Stepping Stones team had previously reported concerns with slow internet speeds; however the system had now been upgraded to provide a faster internet connection.

RESOLVED:

That Cabinet and Council are recommended to adopt the ICT and Digital strategy (Appendix 1) and endorse the core objectives of the digital county.

144 The Shropshire Plan Update

The Leader presented the report which set out the significant progress made by Cabinet and Officers over the intervening 9 months and outlined the next steps for the authority.

Members were asked to approve the appointment of a Strategic Transformation Partner to provide capacity and capability in the delivery of the extensive transformation programme required to deliver The Shropshire Plan within the projected funding envelope over the period of the Medium Term Financial Strategy. Concern was raised regarding the estimated costs of £1million to £3million over three years; however, it was stated that this was investing to save in the long term.

RESOLVED:

That Cabinet:

- Noted the progress made since the approval of The Shropshire Plan by Council, driving the fundamental transformation of the Authority around the vision 'Shropshire Living the Best Life'.
- Approved the appointment of a Strategic Transformation Partner to provide capacity and capability in the delivery of the extensive transformation programme required to deliver The Shropshire Plan within the projected funding envelope over the period of the Medium Term Financial Strategy

145 Church Stretton Neighbourhood Development Plan - Neighbourhood Area Proposal

The Portfolio Holder for Highways and Regulatory Services introduced the report which sought Cabinet approval for the application by Church Stretton Town Council for the Parish area of Church Stretton to be considered as a Neighbourhood Area for the purposes of preparing a Neighbourhood Development Plan.

RESOLVED:

That Cabinet agreed the designation of the proposed Neighbourhood Area identified on the map in Appendix 2, covering the Parish of Church Stretton as an appropriate basis for

the development of a Neighbourhood Development Plan and notifies Church Stretton Town Council accordingly.

146 Exclusion of Press and Public

RESOLVED:

That, in accordance with the provisions of Schedule 12A of the Local Government Act 1972 and Paragraph 10.4 [3] of the Council's Access to Information Rules, the press and public be excluded from the meeting during consideration of the following items

147 Exempt Minutes

RESOLVED:

That the exempt minutes of the meeting held on 18th January 2023 be confirmed as a correct record.

Signed (Chairman)

Date:

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Committee and Date

Cabinet
1st March 2023

Item

Public



Levelling-up and Regeneration Bill: reforms to national planning policy – Shropshire Council Response

Responsible Officer:	Mark Barrow		
email:	mark.barrow@shropshire.gov.uk	Tel:	01743 258919
Cabinet Member (Portfolio Holder):	Richard Marshall, Portfolio Holder for Highways and Regulatory Services		

1. Synopsis

- 1.1 Government is currently consulting on changes to national planning policy, and specifically to changes to the National Planning Policy Framework (NPPF). This report summarises the key areas of the consultation and outlines the proposed Council response.

Executive Summary

- 1.2 Government is currently consulting on changes to national planning policy. The consultation seeks views on the proposed approach to updating the National Planning Policy Framework (NPPF), as well as seeking views on a proposed approach to preparing National Development Management Policies. This is of relevance to Shropshire Council as national policy must be taken into account when preparing a Local Plan (although transitional arrangements would mean that

there are not any significant implications for the Shropshire Local Plan currently subject to Examination in Public) and is a material consideration when determining planning applications. Changes to national policy have the potential to impact on the achievement of the Shropshire Plan - it is generally considered that the changes proposed in this instance can positively contribute, particularly to the 'Health Environment' and 'Healthy Economy' objectives. Indeed, both of these objectives recognise the role of the Local Plan (including through the delivery of high-quality housing and employment development, the protection of our natural environment and responding to our changing climate) in their achievement.

- 1.3 The consultation is part of wider proposed reforms to the Planning system currently being considered as part of the Levelling-Up and Regeneration Bill (the Bill), currently at the Committee stage in the House of Lords, although, the scope of the Council's proposed response is solely on the current consultation. In broad summary the consultation sets out how the Government is seeking to improve aspects of the national planning policy to deliver the wider changes envisaged through the Bill.
- 1.4 The consultation prospectus distinguishes between those specific immediate changes to the NPPF which, subject to outcome of the consultation, will come into effect from spring 2023, and a range of wider proposals to the Planning system, which will require further consultation once the Bill has received Royal Assent. The consultation prospectus also sets out the envisaged role for National Development Management Policies (NDMPs) and asks for initial feedback on their implementation.
- 1.5 The proposed immediate changes to the NPPF, as well as those wider proposals being consulted on, continue to be framed against the Government's objective of delivering 300,000 homes per year by the mid-2020s. It also clarifies the Government's commitment to promoting a Plan-led system as the best and most efficient mechanism to deliver a localised approach to supporting sustainable growth and to avoid speculative development.
- 1.6 The consultation proposals which can be viewed here [Levelling-up and Regeneration Bill: reforms to national planning policy - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/levelling-up-and-regeneration-bill-reforms-to-national-planning-policy) cover a range of themes within the context of developing the Government's following policy objectives (set out in Chapter 2 of the consultation): Building beautiful and refusing ugliness; securing the infrastructure needed to support development; more democratic engagement with communities on local plans; better environmental outcomes; empowering communities to shape their neighbourhoods; and delivering more homes in the right places, supported by sustainable and integrated infrastructure for local communities and the economy. The proposals go on to set out the proposed changes in separate chapters and are covered by 58 questions.
- 1.7 Appendix 1 to this report sets out the proposed response to the Consultation prospectus and responds, where appropriate, to the specific questions asked. In responding, it has been important to reflect upon the implications for Shropshire, especially considering the characteristics of the County, the aspirations set out in the Shropshire Plan, and, of significant importance, the stage of Plan making with the Council's Local Plan review. In drafting the proposed response set out in Appendix 1, officers have engaged Shropshire Council members through a virtual

briefing session on 8th February, with all Members invited. There has also been a meeting of the cross party Local Plan Member Group to discuss the response.

- 1.8 In broad summary, the proposed responses to the consultation seek to provide positive feedback to both the principle and detail (where known) to the proposed changes to national planning policy. It is considered the changes proposed would provide additional protection for Councils against unplanned speculative development, and provide a positive evolution of thought around the implementation of the Housing Delivery and Supply tests. Wider proposed changes around clarification on the use of the ‘Standard Methodology’ for housing need in defining local housing targets are also broadly welcomed, although it should be stressed these changes would not impact on Shropshire’s proposed approach to positive plan-making. Inevitably, there are some areas which would benefit from greater detail and explanation, and there would appear to be some element of internal inconsistency within the NPPF as a result of some of the changes proposed.
- 1.9 It should be stressed that as detailed within the proposed transitional arrangements set out in the consultation prospectus, it is not considered there are any significant implications for the Shropshire Local Plan currently subject to Examination in Public.
- 1.10 In view of the urgent need to submit the Council’s consultation response on 2 March 2023, to meet the deadline for responses, the Call in and Urgency Mechanism in paragraph 17 of the Overview and Scrutiny Procedure Rules will need to be applied to ensure that the response can be submitted within the required timescale i.e. on 2 March 2023.
- 1.11 The consequence of this, is that this decision will not be able to be “called in” in accordance with the Overview and Scrutiny Procedure Rules.

2. Recommendations

- 2.1. To approve the response to the Government’s consultation on reforms to national planning policy as set out in Appendix 1 to this report.
- 2.2. That authority be given to the Executive Director of Place to agree, in consultation with the Portfolio Holder for Highways and Regulatory Services any additional minor changes to the Council’s response to the consultation ahead of its submission to the Government on 2 March 2023.

Report

3. Risk Assessment and Opportunities Appraisal

- 3.1. The consultation prospectus sets out a series of proposed immediate and wider changes to the plan-making system, including changes to the National Planning Policy Framework (NPPF). As with the current system, there is a significant risk to the Council of not following nationally prescribed processes for plan-making. It therefore continues to be particularly important for the Council to understand and respond appropriately to this current consultation and to future consultations on wider aspects of planning reform.
- 3.2. Importantly, the consultation prospectus outlines a series of transitional arrangements to minimise the risk to local authorities of moving to a new system for plan making. Having considered these arrangements, it is considered there is limited risk to the Council in the immediate term in continuing to progress the Local Plan Review through the examination process, which is already well advanced. Indeed, it is considered not to proceed as a result of the proposed changes, would inherently increase the risk to the Council by increasing the prospect of unwanted and unplanned speculative development.
- 3.3. It is considered the consultation prospectus opens up several future positive opportunities, so long as the Council continues to engage positively in plan preparation as currently envisaged. This includes the prospect of being able to prepare Supplementary Plans and Design Codes for covering specific themes and geographical areas, and for these documents to be given increased weight in decision making.

4. Financial Implications

- 4.1. Ensuring that Shropshire Council responds positively to national requirements for plan-making is essential in order to provide sustainable and planned growth strategies for our communities, does and will continue to require a significant and sustained financial undertaking. Significantly, this includes the commissioning of necessary evidence to support the Plan's preparation, and funding the cost of an Examination in Public, e.g. paying for the costs of the Planning Inspectorate.
- 4.2. The consultation prospectus outlined in this report sets out the transition to a new, more streamlined planning system over the coming years. This includes a proposal for authorities to be more proportionate in their evidence collection (whilst continuing to provide necessary information to support the Plan); for Local Plans to be shorter, with a proposals to establish a national suite of Development Management policies; and for Examinations to be shorter and more targeted.
- 4.3. In theory, these factors will reduce some of the current financial burden on authorities preparing local plans. However, and importantly, the detail around many of these measures is not yet known, especially those relating to the wider changes to the plan making system forecast to be introduced in late 2024, and

which will require further consultation with local authorities. In addition, there is a lack of clarity as to the need for other forms of public examinations, such as the newly proposed Supplementary Plans, and the likely extent of the additional financial burden this will produce for local authorities.

- 4.4. It is therefore considered it is too early to tell what level of financial implications the proposed changes will have on local authorities, and the Council will continue to engage and respond constructively to the future rounds of consultation by the government on this matter.
- 4.5. Setting aside the specific changes proposed as part of the consultation prospectus, the overriding intention of the planning system to be plan-led in nature remains, as is the overall ambition for Councils to adopt up-to-date Plans as soon as possible and to keep Plans up-to-date into the proposed new system. The alternative to this would inevitably lead to additional speculative development on unplanned sites, and the increased likelihood of costly appeals and legal challenges to the Council's decisions.

5. Climate Change Appraisal

- 5.1. The pursuit of sustainable development is at the heart of plan-making process and this core principle is maintained in the consultation prospectus. Shropshire Council, along with all other local planning authorities, will need to prepare Plans in accordance with the National Planning Policy Framework and wider planning legislation.
- 5.2. Specifically, Chapters 7 and 8 of the consultation prospectus addresses the issue of securing increased opportunity for energy security, including proposals relating to providing greater flexibility for responding effectively to onshore wind proposals. The Council's response to this section of the consultation prospectus is set out in questions 37-44 of Appendix 1 to this report, and are largely encouraging of the Government's proposals.
- 5.3. The Shropshire Local Plan review, currently at Examination in Public, reinforces existing support for climate change and carbon reduction by supporting energy efficiency, renewable energy generation including as part of new residential development, carbon offsetting and climate change resilience. The proposals in the Government's consultation prospectus are therefore in line with the Council's approach

6. Background

- 6.1 On 22 December 2022 the Department of Levelling Up, Housing and Communities (DHLUC) launched a consultation on a consultation prospectus on reform to national planning policy. The consultation runs until 2 March 2023. The consultation seeks views on government's proposed approach to: updating the National Planning Policy Framework (NPPF); preparation of National Development Management Policies; developing policy to support levelling up; and how national planning policy is currently accessed by users.

- 6.2 There are 58 questions in the consultation. The proposed Shropshire Council response is at Appendix 1. Officers recommend Cabinet supports the proposed response as set out, which provides a generally positive response to the key principles and objectives set out in the consultation, as well as specifically supporting some more detailed elements, including those relating matters of the application of the housing delivery and supply tests.
- 6.3 The following sections summarise the most pertinent aspects of the consultation prospectus as they relate to Shropshire.

Providing Certainty through Local and Neighbourhood Plans

- 6.4 Chapter 3 of the consultation prospectus sets out the Government's intentions to ensure that Local Planning Authorities have a simple, clear Local Plan in place to ensure housing delivery in a sustainable way. This part of the consultation reflects the changes proposed through the Levelling Up and Regeneration Bill (the Bill) to increasing the weight given to adopted plans in decision making, and conversely reducing the amount of speculative development proposed in areas.
- 6.5 Key aspects to the consultation relate to the following areas:
- Reforming the 5 year housing land supply (5YHLS) – The proposal is to remove the requirement for local authorities with an up-to-date Local Plan to demonstrate continually a deliverable 5 year housing land supply, with this change to take effect in spring 2023.
 - Removing the need to provide a 'buffer zone' as part of the five year supply calculations;
 - Allowing Councils to consider a previous over-supply of homes in a plan period to be taken into account in the calculation of five year housing land supply;
 - Boosting the status of Neighbourhood Plans in decision making;
- 6.6 The Council's response to this Chapter is set out in questions 1-5 in Appendix 1 to this report. In summary, the Council are broadly supporting of the proposals, as they provide for additional simplification and clarity, and place added importance on the Development Plan (Local Plan and Neighbourhood Plans) as a starting point for decision making.
- 6.7 It is not considered there are any immediate implications for Shropshire given that the draft Local Plan is at an advanced stage of plan preparation being at Examination, and that the Council currently has a healthy housing land supply and delivery rates. The changes do, however, further clarify the importance of Council's moving positively towards getting Local Plans in place.

Planning for Housing

- 6.8 Chapter 4 of the consultation prospectus sets out the Government's intentions to ensure enough land is allocated to provide the right homes in the right places that communities need, alongside other economic, social and environmental needs, and seeks views on potential changes to the Framework and planning practice guidance.
- 6.9 Key aspects to the consultation relate to the following areas:

- Introducing flexibilities to areas meeting housing needs. This includes the use, in exceptional circumstances, of an alternative approach to the nationally defined ‘standard methodology’ of housing need, but also clarifying that the ‘standard methodology’ is an advisory starting point to inform plan making – a guide that is not mandatory;
- In defining whether a local area can meet all of its housing need, the following changes to the framework are proposed:
 - o Building at densities that would be significantly out of character may outweigh the benefits of meeting need in full;
 - o Making it clear that local planning authorities are not required to review and alter Green Belt boundaries if this is the only way of meeting need in full (although authorities would still be able to review Green Belt boundaries if they wish);
 - o Allow authorities to take past ‘over delivery’ of housing into account in setting local requirements in a new local plan
- Introducing a more proportionate assessment for Local Plans, but removing the current requirement for Plans to be ‘justified’ (although there remains an expectation that plans will be supported by evidence to inform and explain the plan)
- Clarification that the Bill will remove the current Duty to Cooperate and replace this with a new “alignment policy” as part of future revisions to the Framework, which will be subject to additional consultation in due course;
- Areas where a Local Plan is well advanced in preparation (including Shropshire), will be subject to a reduced requirement to demonstrate a four year housing land supply for a time limited period of 2 years from the point the changes to the Framework

6.10 The Council’s response to this Chapter is set out in questions 6-21 in Appendix 1 to this report. In summary, the Council are broadly supporting of the proposals, as they provide for additional simplification and clarity to application of the ‘standard methodology’ for housing need, and recognise the need to provide local authorities with additional protections against speculative development as they develop their Local Plans. However, there are some concerns expressed that the proposed changes regarding Green Belt may lead to an increased need for some local authorities to seek to displace their housing need on to neighbouring and closely related areas.

6.11 It is not considered there are any immediate implications for Shropshire given that the draft Local Plan is at an advanced stage of plan preparation being at Examination, and that the Council currently has a healthy housing land supply and delivery rates. The changes do, however, further clarify the importance of Council’s moving positively towards getting Local Plans in place in a timely manner.

A Planning System for Communities

6.12 To support the delivery of different types of homes, including more genuinely affordable housing for communities, the consultation prospectus proposes some modest changes to the NPPF from 2023 as well as seeking views on wider proposals. In summary the consultation prospectus proposes to provide great weight to social rent as an affordable housing tenure in decision making; provide more explicit reference to providing specialist accommodation for older people; and strengthening the emphasis in the NPPF to the role of community-led groups in delivering affordable housing. In addition, the consultation prospectus sets out

new proposals to encourage increased rates of build out on sites with planning permission.

- 6.13 The Councils proposed response to this section of the consultation prospectus is within questions 26-32 of Appendix 1. Whilst providing broad support for the proposals, the Councils proposed response highlights the continued need to reflect upon local evidence of need in considering decisions on the most appropriate affordable housing tenure to support local communities.

Asking for Beauty

- 6.14 Section 6 of the consultation prospectus reiterates the Government's broad proposals to encourage better design in new development, and in particular through the use of Design Codes for setting minimum standards for on development in an area, as well as embracing opportunities to build upwards in managed ways, to support gentle increases in density.
- 6.15 The Council's proposed response to this section are set out in paragraphs 33-36 of Appendix 1 to this report.

Protecting the Environment and Tackling Climate Change, and Onshore Wind and Energy Efficiency

- 6.16 Chapters 7 of the consultation largely reiterates the Government's existing proposals around delivering biodiversity net gain and local nature recovery; recognising the food production value of farmland; and climate change mitigation and adaptation. Chapter 8 sets out the Government's proposals to amend current planning policy around the consideration of onshore wind, both for repowering existing turbines and introducing more flexibility to planning for new onshore wind deployment.
- 6.17 The Council's response to these chapters are set out in questions 37-44 of Appendix 1 to this report. With regard to the new proposals for amending national policy related to onshore wind development, the Council recognises that there would be a necessity to ensure community support for such proposals, and that in line with the draft proposals contained in the Shropshire Local Plan, it continues to be considered that Neighbourhood Plans provide a good avenue in order to demonstrate such support.

Preparing for the new System of Plan-Making

- 6.18 To support the intentions of the Levelling Up and Regeneration Bill of producing more simplified plans more quickly, the consultation prospectus provides additional clarity on the timeline for local authorities to continue to prepare Plans under the current system whilst preparing for the proposed changes. This proposes that all local authorities must submit their Plans for examination by 30th June 2025 under the current system. Under the proposed reformed planning system, as set out in the Bill and expected to go live in late 2024, there will be a requirement on local authorities to start work on a new Local Plan at the latest 5 years after the adoption of their previous Plan, and to adopt that new Plan within 30 months.

- 6.19 Shropshire is currently at Examination on the Local Plan review and it is anticipated, subject to the outcomes of the Examination, that the Council could be in a position to adopt the Plan by late 2023 or early 2024. Within this context, it is therefore not considered the proposed clarifications to the timeline impact Shropshire in the immediate term. They will however, impact upon the timing and content of future local plan reviews.
- 6.20 In addition, it is proposed that Neighbourhood Plans submitted for Examination after 30th June 2025 will be required to comply with the new legal Framework. Given there is currently a significant amount of interest from local communities in Shropshire to progress Neighbourhood Plans, the Council will continue to liaise closely with these groups in order to understand their timeframes for preparation and if the proposed national changes will have an impact.
- 6.21 The consultation prospectus also establishes that local authorities will no longer be able to prepare Supplementary Planning Documents (SPDs), and instead will be able to prepare Supplementary Plans. Importantly, it is proposed these Supplementary Plans will be afforded the same weight as a local plan in decision making. Transitional arrangements are proposed to support this change. Whilst not explicitly set out in the consultation, it is anticipated that this change will require an additional independent examination phase for Supplementary Plans. Given the potential importance of Supplementary Plans to provide further clarity and guidance towards the application of Local Plan policies, it is considered this proposed change will have some immediate implications for Shropshire and future work programmes, especially following the adoption of the Local Plan review.
- 6.22 The Councils response to this section is set out in questions 45-48 of Appendix 1.
- 6.23 Chapter 10 of the consultation prospectus deals with the broad principle of introducing new National Development Management Policies (NDMPs), currently being proposed in the currently within the draft Levelling Up and Regeneration Bill, to have statutory weight in decision making locally. It is made clear that additional consultation with local authorities will take place on any detailed draft NDMPs in due course following the path of the Bill.
- 6.24 Whilst broadly supportive of the principle of NDMPs principally to enable the production of shorter more concise Local Plans, the Councils response (set out in questions 49 and 50 of Appendix 1 to this report), argues that such an approach should not undermined either the primacy of the locally prepared Development Plan for decision taking, nor should it undermine the ability of local authorities to expand upon NDMPs to reflect local circumstances.

List of Background Papers (This MUST be completed for all reports, but does not include items containing exempt or confidential information)

None

Local Member: *All members*

Appendices

Appendix 1 – Shropshire Council Response: Consultation on Levelling-Up and Regeneration Bill: Reforms to National Planning Policy

Appendix 1

Shropshire Council Response:

Consultation on Levelling-up and Regeneration Bill: Reforms to National Planning Policy



- 1 Do you agree that local planning authorities should not have to continually demonstrate a deliverable 5-year housing land supply (5YHLS) as long as the housing requirement set out in its strategic policies is less than 5 years old?

Yes. Shropshire Council is supportive of the principle that Local Planning Authorities should not have to demonstrate a deliverable 5-year housing land supply in circumstances where the housing requirement for its area is set out in a strategic policy that is less than 5 years old.

However, as documented within paragraph 6 of the component of this consultation titled *“Setting out the timeline for preparing local plans, spatial development strategies, minerals and waste plans and supplementary plans under the reformed system”* the reformed system would require Local Plans to be reviewed within 5 years of their adoption and expects reviews to be completed within 30 months. As such, it would seem practical to align the period within which Local Planning Authorities are not required to demonstrate a deliverable 5-year housing land supply, with this wider period – 5 years plus 30 months.

Shropshire Council would also note that the current and proposed requirement is to demonstrate a deliverable 5-year housing land supply on an annual basis, rather than continually. This is an important point as the data gathering and analysis process required to undertake an assessment of the housing land supply is extensive and it would be impractical to suggest that where such an assessment is required, it can be undertaken on anything other than an annual basis.

- 2 Do you agree that buffers should not be required as part of 5YHLS calculations (this includes the 20% buffer as applied by the Housing Delivery Test)?

Shropshire council is supportive of the principle of removing the application of a buffer (consisting of supply brought forward from later within the plan period) when calculating the five year housing land supply for an area.

- 3 Should an oversupply of homes early in a plan period be taken into consideration when calculating a 5YHLS later on or is there an alternative approach that is preferable?

Shropshire Council strongly supports this proposal. The purpose of the five year housing land supply is to ensure that housing need can and will be met. Over-delivery of housing earlier in the plan period is and will continue to meet the housing needs of our communities. Recognition of this fact within the Five Year Housing Land Supply Assessment is entirely logical and appropriate.

This would also ensure consistency with the approach to past under-delivery from earlier in the plan period. Shropshire Council does not consider an alternative approach would be more preferable.

4 What should any planning guidance dealing with oversupply and undersupply say?

The planning guidance should specify clearly and concisely how past over-supply from earlier within the plan period should be taken into account. This guidance needs to ensure that there is no room for misinterpretation or challenge and that there is a consistent understanding of the matter.

Shropshire Council would suggest that the specific mechanism is comparable to that recommended within planning guidance (paragraph 31 of the National Planning Practice Guidance (ID68) on Housing Supply and Delivery) with regard to past under-supply from earlier within the plan period. Specifically:

“The level of over-provision against the adopted housing requirement should be calculated from the base date of the adopted plan and subtracted from the adopted plans housing requirements for the next 5 year period.”

This is clear and concise guidance.

5 Do you have any views about the potential changes to paragraph 14 of the existing Framework and increasing the protection given to neighbourhood plans?

Shropshire Council is generally supportive of the proposed amendments to existing paragraph 14 of the NPPF, which make it much clearer for all, particularly those communities undertaking Neighbourhood Plans, and simple to apply in relation to the presumption in favour of sustainable development. It removes the complexity associated with reviewing the Local Planning Authority's supply and delivery and rather focuses on underpinning the value and role of the Neighbourhood Plan.

Shropshire Council is very much supportive of communities preparing Neighbourhood Plans which positively plan for the area and have a clear purpose. However, it is important to recognise the amount of work that is required during this process. The proposed changes to existing paragraph 14 of the NPPF would positively respond to the time and effort that communities invest in preparing Neighbourhood Plans.

However, Shropshire Council would also encourage a review of the wording of existing paragraph 14a of the NPPF. Currently this requires a Neighbourhood Plan to contain policies and allocations to meet its housing requirements if it is to represent a relevant document in the context of existing paragraph 14 of the NPPF. Given that there are various ways to positively plan for an area, we would suggest that this is amended to specify that a Neighbourhood Plan should: contain policies and/or allocations to meet its housing requirements.

6 Do you agree that the opening chapters of the Framework should be revised to be clearer about the importance of planning for the homes and other development our communities need?

This question appears to be (albeit unconfirmed) for the changes to existing paragraphs 1 and 7 of the NPPF – the intention of these proposed changes are supported. However, whilst we understand

the rationale behind the proposed changes, it is considered that the intended objective as documented within the consultation material could more clearly be expressed, perhaps through the inclusion of a new paragraph specifically addressing the matter.

Furthermore, it is noted that there is a clear contradiction between paragraph 11b of this chapter and the revised existing paragraph 35a of Chapter 3: Plan Making. It is assumed that this is unintentional and as such it is assumed that paragraph 11b should have “as a minimum” deleted. Shropshire Council is content with the deletion of existing paragraph 35b and the requisite changes to existing paragraph 11b.

7 What are your views on the implications these changes may have on plan-making and housing supply?

Shropshire Council is concerned that where the housing need calculated for an urban area cannot be achieved within the urban area (particularly if meeting housing need is no longer considered an appropriate justification for the release of Green Belt), that if this is not considered an appropriate exceptional circumstance to justify an alternative method for calculating housing need, this could lead to the displacement of housing need to less sustainable or more rural locations that are not in the Green Belt, which seems contradictory to the stated aspiration within proposed paragraph 62 and proposed footnote 30 of the NPPF.

More positively, in combination with the proposed removal of the Duty to Cooperate, such an approach may increase the focus on brownfield land development. The changes proposed in terms of Green Belt would also ultimately make the plan-making process more expedient for Green Belt Authorities, as it would reduce the need to undertake Green Belt assessments..

As documented in response to question 3, Shropshire Council strongly supports the proposal to recognised past over-delivery in the context of the five year housing land supply assessment. The same principle applies with regard to the assessment of need.

8 Do you agree that policy and guidance should be clearer on what may constitute an exceptional circumstance for the use of an alternative approach for assessing local housing needs? Are there other issues we should consider alongside those set out above?

Yes. Currently exceptional circumstances for utilising an alternative method for assessing housing need is referenced within existing paragraph 61 and within paragraphs 3 and 15 of the National Planning Practice Guidance (ID2a) on Housing and Economic Development Needs Assessments, however at no point is any guidance provided on what actually constitutes an exceptional circumstance. Rather it simply explains that this will be tested at examination.

The lack of clarity regarding what does or does not constitute an exceptional circumstance gives rise to subjectivity, debate with various stakeholders who have different perspectives, and ultimately will extend the timescales required to prepare a Local Plan and for subsequent Local Plan examinations.

The difficulty of course is identifying exceptional circumstances that are responsive to the diverse range of situations that exist and may (or may not) justify the use of an alternative method for assessing housing need.

Shropshire Council is concerned that where the housing need calculated for an urban area cannot be achieved within the urban area (particularly if meeting housing need is no longer considered an appropriate justification for the release of Green Belt), that if this is not considered an appropriate exceptional circumstance to justify an alternative method for calculating housing need, this could lead to the displacement of housing need to less sustainable or more rural locations that are not in the Green Belt, which seems contradictory to the stated aspiration within proposed paragraph 62 and proposed footnote 30 of the NPPF.

- 9 Do you agree that national policy should make clear that Green Belt does not need to be reviewed or altered when making plans, that building at densities significantly out of character with an existing area may be considered in assessing whether housing need can be met, and that past over-supply may be taken into account?

Partially.

Shropshire Council supports the principle of ensuring high quality and attractive development and achieving well-designed and beautiful places. An important factor that will influence this is ensuring that the density of new development is responsive to that of the existing area.

However, it is important to ensure that the measurement of density is not undertaken in such a way that it reduces incentives for providing an appropriate mix of dwelling types and sizes – specifically if density is calculated using number of dwellings rather than floorspace then developers are likely to seek to increase the number of larger dwellings in order to maximise saleable floorspace.

Shropshire Council is equally supportive of the principle of allowing past over-delivery of housing to be taken into account when assessing future housing need. This is entirely logical and appropriate as the focus is ultimately on meeting the housing needs of our communities.

With regard to Green Belt, the principle of not requiring Green Belt reviews in circumstances where this would be the only way to meet housing need has merit and would shorten timescales for the production of Local Plans as Green Belt reviews are often complex, controversial and time-consuming. However, Shropshire Council is concerned regarding the potential for unintended consequences – as referenced within its response to Question 8. Specifically, if an urban area could only meet its housing need via the release of Green Belt, if this is not considered an appropriate exceptional circumstance for using an alternative method for assessing housing need which reduces the overall housing need, then there is a risk that this need would get displaced to less sustainable and rural locations beyond the Green Belt.

- 10 Do you have views on what evidence local planning authorities should be expected to provide when making the case that need could only be met by building at densities significantly out of character with the existing area?

As per our response to Question 9, Shropshire Council's initial view is that the measurement of density should be undertaken in the context of floorspace rather than dwellings.

It would seem logical to identify appropriate floorspace ranges for settlements/locations within the Housing and Employment Land Availability Assessments undertaken to inform proposed site allocations. This could then be reflected within local design codes.

This process could be proactively informed through submissions by landowners/developers during the call for sites process, during which developers could provide example density layouts and illustrate how they are responsive to local character.

- 11 Do you agree with removing the explicit requirement for plans to be 'justified', on the basis of delivering a more proportionate approach to examination?

Shropshire Council is content that the explicit reference to justification is removed from the 'soundness' tests identified within Paragraph 35 of the NPPF.

As is recognised within the consultation material, there remains a need for proportionate assessment when plans are examined, and authorities would still need to produce evidence to inform and explain their plan, to satisfy requirements for environmental assessment, and to satisfy the wider requirements of the NPPF.

There should be clear guidance on what essential evidence is required. This is important even if the process and evidence requirements are to be simplified. This could be identified through updated to the Plan Making (ID61) component of the National Planning Practice Guidance.

- 12 Do you agree with our proposal to not apply revised tests of soundness to plans at more advanced stages of preparation? If no, which if any, plans should the revised tests apply to?

Yes, although Shropshire Council would note that this could incentivise Local Planning Authorities to delay plan making.

- 13 Do you agree that we should make a change to the Framework on the application of the urban uplift?

Shropshire Council supports the principles expressed within proposed paragraph 62 of the NPPF. Specifically, that the urban uplift should be met within the urban area itself as it is these locations that have the greatest potential to make the most effective use of brownfield land. Although we

would note that some ambiguity remains regarding the wider need calculated using the standard method which should be addressed, as it could be read that the uplift must be addressed within the urban area but the base need can be 'exported'.

Shropshire Council also supports the recognition within proposed paragraph 62 of the NPPF that the principle that the urban uplift is met in the urban area does not apply where it would result in conflict with the NPPF or legal obligations.

However, we are concerned about the potential tension between the issues of unmet need, seeking to meet needs within urban areas, the factors that can justify an alternative method for assessing need and the potential implications of displacement of need from urban to rural areas, which seems to be contrary to the aspiration of proposed paragraph 62 of the NPPF.

14 What, if any, additional policy or guidance could the department provide which could help support authorities plan for more homes in urban areas where the uplift applies?

Shropshire Council's administrative area does not contain one of the 20 largest towns or cities subject to the 35% uplift within the standard method for calculating housing need.

However, it would seem sensible to provide further guidance on how brownfield sites (particularly large brownfield sites) can be comprehensively and efficiently delivered in order to optimise their potential and ensure that they effectively contribute to initially the housing land supply and subsequently housing delivery for an area in the short, medium and long term. This is particularly relevant given that one of the factors that informed the 35% uplift for these areas is the availability of such land, yet it is often the case that this land is difficult and time consuming to bring forward, which impacts on its ability to support the housing land supply and housing delivery for a Local Planning Authority in the short – medium term.

15 How, if at all, should neighbouring authorities consider the urban uplift applying, where part of those neighbouring authorities also functions as part of the wider economic, transport or housing market for the core town/city?

Shropshire Council recognises that the boundaries of some towns and cities mean that there can be minimal distinction between areas that are part of one of the 20 urban uplift authorities and neighbouring authorities. Given that these areas often function as a single centre, it would seem sensible for some recognition of this within the NPPF.

Equally, Shropshire Council recognises that this is not the case for more rural authorities that adjoin or are in proximity to urban areas subject to the uplift. This should be equally recognised and the implications explained.

Shropshire Council considers that the issues of unmet need, seeking to meet needs within urban areas, the factors that can justify an alternative method for assessing need and the potential implications of displacement of need from urban to rural areas need to be carefully explained.

- 16 Do you agree with the proposed 4-year rolling land supply requirement for emerging plans, where work is needed to revise the plan to take account of revised national policy on addressing constraints and reflecting any past over-supply? If no, what approach should be taken, if any?

Shropshire Council notes that there is currently no reference in the draft NPPF to a “4 year rolling land supply requirement.” However, such an approach would be supported by Shropshire Council for all Local Planning Authorities in the stage of the plan described (i.e. when a local plan has been submitted for examination or has reached the Reg-18 or Reg-19 stage of consultation for a period of 2 years from the point that the proposed changes to the NPPF take effect).

Shropshire Council would strongly recommend that any reference to the assessment of housing land supply is described as annual rather than rolling. This would ensure consistency with the current and proposed wording of existing paragraph 74 of the NPPF and also reflects the considerable time and resource implications for undertaking an assessment of housing land supply.

- 17 Do you consider that the additional guidance on constraints should apply to plans continuing to be prepared under the transitional arrangements set out in the existing Framework paragraph 220?

Not applicable to Shropshire Council. The draft Shropshire Local Plan was submitted for examination prior to the dates referenced in this section.

- 18 Do you support adding an additional permissions-based test that will ‘switch off’ the application of the presumption in favour of sustainable development where an authority can demonstrate sufficient permissions to meet its housing requirement?

Shropshire Council supports the principle of having a ‘switch off’ for the housing delivery test in circumstances where a robust supply exists and it is development activity that is causing delay.

However, it is considered that the limitation of the ‘switch off’ to permissions is too constrained, another aspect of developer activity that can lead to delays to delivery is land-banking of site allocations. As such, we would strongly encourage the amendment of this ‘switch off’ test to encompass allocations within adopted Local Plans, in order to provide further support for the plan led approach.

- 19 Do you consider that the 115% 'switch-off' figure (required to turn off the presumption in favour of sustainable development Housing Delivery Test consequence) is appropriate?

Shropshire Council is supportive of the principle of a buffer to the 'switch-off' mechanism and is comfortable with this being 15% above need. However, we disagree with the suggestion that the 15% 'buffer' is appropriate as it reflects the number of planning permissions that are not progressed or are revised.

There is a significant distinction between planning permissions being revised and the associated development not being delivered (schemes can be revised but still delivered within a five year period for instance). Ultimately the amount of development that is not delivered on planning permissions will vary significantly from one area to another.

If such a justification is utilised for the 'switch-off' buffer, it is inevitable that this will lead to dispute about whether such a figure is or is not appropriate within a specific location.

This proposal also risks causing unintended consequences. Specifically, if this 'switch-off' buffer establishes the principle that 15% of planning permissions are not deliverable in the context of this test, then this will be referenced by developers seeking to undermine a Council's five year housing land supply (where one is required).

We would therefore encourage the use of an alternative means for determining an appropriate buffer for the 'switch-off' of the Housing Delivery Test.

Shropshire Council also considers that the explanation of any 'switch-off' of the Housing Delivery Test should be provided within a paragraph of the NPPF rather than a footnote, to provide clarity and certainty to all parties.

- 20 Do you have views on a robust method for counting deliverable homes permissioned for these purposes?

Shropshire Council considers that such an assessment should be informed by a Council's assessment of its five year housing land supply.

- 21 What are your views on the right approach to applying Housing Delivery Test consequences pending the 2022 results?

No comment – Shropshire Council continues to positively plan for and maintain its delivery above need.

22 Do you agree that the government should revise national planning policy to attach more weight to Social Rent in planning policies and decisions? If yes, do you have any specific suggestions on the best mechanisms for doing this?

All affordable housing tenures should receive equal weight in National Planning Policy, and it should be the local policies that dictate what weight should be given to each tenure based on the identified need for that area. For some Local Planning Authority areas, a set percentage for a certain tenure, for example the current 10% requirement for Low Cost Home Ownership causes issues when the total affordable housing provision is also 10% and the identified need is greater for Affordable Rent homes. Allowing Local Authorities to set their own percentages based on evidence of local needs would be a fairer way forward and would best meet needs. If more emphasis was to be placed on Social Rented homes then a provision should be inserted (as with the Low-Cost Home Ownership) that if local evidence suggests otherwise a different split can be used.

Shropshire Council would also advocate for contributions towards affordable housing to be provided by schemes of less than 10 dwellings (or 5 in rural areas), where such contributions are viable. In locations such as Shropshire, small scale development represents a significant component of the total development that occurs, and it seems logical that these developments should proportionately contribute towards meeting affordable housing need.

23 Do you agree that we should amend existing paragraph 62 of the Framework to support the supply of specialist older people's housing?

Shropshire Council agrees with the principle of the proposed change to existing paragraph 62 of the NPPF to include specific reference to retirement housing, housing with care and care homes as types of specialist housing for older people to be assessed and reflected in planning policies. Such an approach is generally consistent with the guidance provided within the National Planning Practice Guidance (ID63) Housing for Older and Disabled People and ensures that Local Planning Authorities and will support the provision of the types of specialist housing needed within an area, but equally ensures that the development industry is aware of the types of specialist housing that are not considered necessary or appropriate in an area.

However, Shropshire Council would encourage the types of specialist housing referenced to align with the definitions of specialist housing provided within paragraph 11 of the National Planning Practice Guidance (ID63) on Housing for Older and Disabled People and to also include specific reference to the role of accessible and adaptable housing in meeting the housing needs of older people. Such an approach would ensure greater consistency with guidance and clarify the important role that accessible and adaptable housing can play in meeting the housing needs of older people – particularly as technology advances.

It is also important to recognise that the amount of specialist housing needed within an area is complex and should be informed by the characteristics and constraints and the adult social care strategy for an area, rather than simply responding to standard national prevalence rates. For instance, the prevalence rates of many forms of specialist housing within a rural area such as Shropshire will inevitably be different to that of an urban area, as many forms of specialist housing require economies of scale that cannot be achieved within our rural communities and to suggest that residents need to leave their existing community to live in specialist housing would not be responsive to their needs or aspirations.

24 Do you have views on the effectiveness of the existing small sites policy in the National Planning Policy Framework (set out in paragraph 69 of the existing Framework)?

Shropshire Council considers that the requirements of existing paragraph 69 are effective without constraining the ability to respond to local circumstances or causing significant delays to the plan making process as authorities seek to identify/sub-divide larger sites in order to achieve a specific quota of small/medium sized allocations or too high a minimum amount of development on small/medium sized sites. As such, we would not support amendments to this paragraph.

Whilst small and medium sized sites brought forward by self-builders, small and medium sized developers and other developers play an important role within the housing market, so do larger sites brought forward by developers with the capacity to undertake such sites.

Shropshire Council has successfully enabled a mix of small, medium and large housing sites through a combination of site allocations and a positive approach to appropriate windfall sites, which is consistent with the current policy approach.

25 How, if at all, do you think the policy could be strengthened to encourage greater use of small sites, especially those that will deliver high levels of affordable housing?

Shropshire Council considers that existing paragraph 69 of the NPPF appropriately cover the relevant points and so no changes are suggested.

26 Should the definition of “affordable housing for rent” in the Framework glossary be amended to make it easier for organisations that are not Registered Providers – in particular, community-led developers and almshouses – to develop new affordable homes?

In Shropshire we have used a separate definition for private rented affordable units (Discounted Rent). Affordable rent is purely for Registered Providers. It is difficult to monitor and enforce Discounted Rent units and although it would be easier to monitor Alms house or Community Led Groups, they should still be defined separately so Local Authorities can have separate policies for private rents.

27 Are there any changes that could be made to exception site policy that would make it easier for community groups to bring forward affordable housing?

Shropshire Council’s experience is that Community Led Schemes are very labour intensive, take much longer to complete and on the whole are more expensive. The Council believes that the exception site policy as it stands allows for community led groups to develop them and therefore do not feel any amendments are necessary. Shropshire Council has a good track record of supporting communities through the process of bringing forward community led affordable housing schemes.

28 Is there anything else that you think would help community groups in delivering affordable housing on exception sites?

Shropshire Council and our communities have been very successful in bringing forward Community Led Developments, with 15 schemes either completed or on site. Only one of these have seen the Community Group take ownership of the completed units.

Shropshire Council considers that the main change that would help Community Groups to come forward is the knowledge that they can be fully responsible for the development so identify need, a site, scheme layout and design and local connection allocation criteria, but not have to take on the long term responsibilities of managing the units or take on the financial risks.

In Shropshire, when a community group is formed, we provide them the option of a 'true' Community Led Scheme where they take on full responsibility and risk or they can choose a partner Housing Association (by way of a selection process), the majority choose the partnership approach as they get to fully influence the development without any of the risky elements. The new definition in the glossary should be expanded to include a partnership approach.

29 Is there anything else national planning policy could do to support community-led developments?

Include options for the provision of community led development not just an all or nothing approach. Hybrid approaches should be encouraged.

30 Do you agree in principle that an applicant's past behaviour should be taken into account into decision making?

In principle this seems a sensible suggestion – in particular the ability to recognise those limited numbers of developers which neglect their responsibility/requirements under any agreements such as a 106, or planning conditions, negligent builds and fraudulent behaviour. However, Shropshire Council envisages a number of potential issues with such an approach. Including:

- Situations where an individual liquidates a development company and starts another under a new name. This is already an issue that Shropshire Council has experienced in the past, particularly in circumstances where a developer has outstanding financial obligations towards necessary infrastructure and/or affordable housing. Such an approach can make securing this funding complex and would equally make the process of determining whether past history is relevant complex. There is also a risk that this proposal could actually lead to more of this behaviour.
- There would perhaps inevitably be conflicting views about what constitutes unreasonable behaviour and the amount of weight that should be given to such behaviour. This could add unnecessary complexity to the decision making process and would also undoubtedly lead to the risk of more legal challenges on decisions.

- Planning permission runs with the land and often the applicant is not the developer, so the same ‘problem developers’ could still bring forward development and the perception would be this is the Local Authorities fault, when we have no control over the matter.
- Equally, if a ‘problem developer’ secures an option on an important development site, then this could significantly delay delivery jeopardising the spatial strategy, housing land supply and housing delivery in an area.

31 Of the two options above, what would be the most effective mechanism? Are there any alternative mechanisms?

Shropshire Council would prefer Option 2 as it considers that Option 1 would be more likely open to challenge and appeals delaying the decision making process. Option 2 would reduce the level of risk (although both options are considered difficult to implement and would have risk associated with them).

32 Do you agree that the 3 build out policy measures that we propose to introduce through policy will help incentivise developers to build out more quickly? Do you have any comments on the design of these policy measures?

Shropshire Council is supportive of the proposed measures aimed at incentivising prompt housing delivery on development sites.

Shropshire Council is particularly supportive of the concept of developers being required to notify Council’s of commencement (this is often required with regard to CIL and/or S106 obligations and there is perhaps an opportunity to regularise this); and the principle that developers will be required to notify Council’s annually of progress, as this would significantly speed up the annual monitoring process. Shropshire Council has a good relationship with many of the developers operating in Shropshire, but this would speed up the communication process. However, we would ask that clarity is provided on how this will be applied to smaller developers, or those undertaking self-build projects, as whilst small schemes these are often the ones that entail the most time when undertaking monitoring. We would urge these measures to be introduced as soon as possible.

Shropshire Council is also supportive of the concept of requiring developers to explain how they will increase the diversity of housing tenures (and would suggest that this is also expanded to housing types and sizes), as this will allow for greater market absorption but will also lead to the provision of more diverse types of housing better able to meet the diverse needs of communities and lead to more inclusive communities. This would align with both local and national policy.

33 Do you agree with making changes to emphasise the role of beauty and placemaking in strategic policies and to further encourage well-designed and beautiful development?

The proposed amendments to para 135 (to be changed to para 137) are supported as this gives a clear indication of what is expected with very little room for negotiation or interpretation.

However, much of this is very subjective, and often time-consuming and so contradicts the overall message that this revised NPPF is set up to make the plan-making process as a whole much more expedient

The focus on making “beautiful places” need greater clarity on what is required from a Local Authority, as it is not explicit as to whether the NPPF covers design as a whole or whether greater detail is still required within a local plan with a policy specifically on design.

34 Do you agree to the proposed changes to the title of Chapter 12, existing paragraphs 84a and 124c to include the word ‘beautiful’ when referring to ‘well-designed places’, to further encourage well-designed and beautiful development?

Shropshire Council is very much supportive of achieving well-designed and high-quality development. However, the concept of what is “beautiful” is subjective and such subjectivity could extend the timescales for determining planning applications where a developer argues that the design is beautiful where an authority and/or objectors would disagree (so much so that a refusal on such grounds could lead to appeals and possible further litigation).

35 Do you agree greater visual clarity on design requirements set out in planning conditions should be encouraged to support effective enforcement action?

Yes. To reduce any ambiguity and thus give planning officers clear guidance on what is/is not acceptable which would ultimately reduce any challenges or appeals on this aspect.

36 Do you agree that a specific reference to mansard roofs in relation to upward extensions in Chapter 11, paragraph 122e of the existing framework is helpful in encouraging LPAs to consider these as a means of increasing densification/creation of new homes? If no, how else might we achieve this objective?

Shropshire Council is generally supportive of this proposed change to the NPPF. However, we would suggest that in addition to consideration of whether a mansard roofs external appearance harmonises with the original building, there is also a need to consider whether it harmonises with the character of the area. The appropriateness of a mansard roof is ultimately a judgement that should be undertaken on a case by case basis informed by how it harmonises with the original building and wider character of the area.

Whilst Shropshire Council has not received significant numbers of applications which include mansard roofs, as a principle we would dispute the statement within the consultation material that it is wrong to consider mansard roofs harmful to the character of an area. This is a decision that needs to be made informed by careful consideration of the specific characteristics of an area, if we are to work towards achieving well-designed and beautiful places.

Shropshire Council would also note that in achieving gentle densification, it will also be important to consider availability of all forms of infrastructure.

37 How do you think national policy on small scale nature interventions could be strengthened? For example, in relation to the use of artificial grass by developers in new development?

Shropshire Council would suggest making explicit references to small-scale nature interventions that are or are not considered acceptable. Addressing that within the proposed National Development Management Policies would negate the need for Local Plans to also include this.

With specific regard to artificial grass, there is growing evidence that its use is problematic for nature and can contribute to the urban heat island effect. As such, restricting its use within new development is generally supported by Shropshire Council. However, there are currently no restrictions placed on homeowners using artificial grass once they purchase a new home (or indeed in association with their existing homes). As such, it may be appropriate for Government to consider whether there are measures outside the planning system which could positively control the use of artificial grass in domestic settings.

38 Do you agree that this is the right approach making sure that the food production value of high value farm land is adequately weighted in the planning process, in addition to current references in the Framework on best most versatile agricultural land?

Yes. Shropshire Council is supportive of this proposal. Food security is an important local and national consideration and it is important that high value farm land is adequately weighted in the planning decision making process.

However, to support its implementation across the Country, it would seem sensible for Government to undertake an updated national assessment of agricultural land quality in order to sub-divide grades 3a and 3b agricultural land and provide certainty to all as to where best and most versatile agricultural land is located.

- 39 What method or measure could provide a proportionate and effective means of undertaking a carbon impact assessment that would incorporate all measurable carbon demand created from plan-making and planning decisions?

Shropshire Councils is broadly supportive of the principle of improving the evidence underpinning carbon impact assessments, although at this stage there does not appear to be an obvious source of information to support this, and as such an assessment and it would be extremely difficult to compare different options effectively.

- 40 Do you have any views on how planning policy could support climate change adaptation further, specifically through the use of nature-based solutions that provide multi-functional benefits?

Shropshire Council is supportive of the principle of providing greater scope for planning policies and local plans to contribute to climate change adaptation, particularly through the promotion of nature-based solutions that provide multi-functional benefits. The Council is already embracing such opportunities within the draft Shropshire Local Plan, which has been informed by a detailed Green Infrastructure Assessment, including opportunity mapping.

Shropshire Council also considers that there is a need for a clear explanation of the role of planning policy and building regulations with regard to climate change matters, as currently there is a lack of clarity and confusion on what Local Plan policies can and cannot do.

- 41 Do you agree with the changes proposed to Paragraph 155 of the existing National Planning Policy Framework?

Yes. Shropshire Council is generally supportive of the proposed change to existing paragraph 155 of the NPPF and the principle of providing greater certainty and support for the re-powering and maintenance of existing renewable energy infrastructure.

- 42 Do you agree with the changes proposed to Paragraph 158 of the existing National Planning Policy Framework?

Yes. Shropshire Council is generally supportive of the proposed change to existing paragraph 158 of the NPPF and the principle of providing greater certainty and support for the re-powering and maintenance of existing renewable energy infrastructure.

Shropshire Council would note that this proposed change would apply to all forms of renewable energy and not only wind turbines as is implied within the consultation material. However, this principle is also supported.

43 Do you agree with the changes proposed to footnote 54 of the existing National Planning Policy Framework? Do you have any views on specific wording for new footnote 62?

Yes. Shropshire Council is generally supportive of the proposed change to existing footnote 54 of the NPPF. This change strikes an appropriate balance between providing greater flexibility for Local Planning Authorities to identify appropriate areas for wind turbines, whilst also continuing to ensure that the views of the local communities are addressed.

However, Shropshire Council would suggest that a specific reference to Neighbourhood Plans is included within existing footnote 54. Whilst Neighbourhood Plans are of course a part of the Development Plan, this would remove any uncertainty or ambiguity on this matter. Shropshire Council is of the opinion that Neighbourhood Plans are a particularly effective means of identifying appropriate areas for wind turbines with community support, as they are prepared by the relevant community.

Shropshire Council would also note that the wider reforms to the planning system include ceasing to prepare Supplementary Planning Documents. In the longer term this will need to be reflected within the context of this matter.

44 Do you agree with our proposed Paragraph 161 in the National Planning Policy Framework to give significant weight to proposals which allow the adaptation of existing buildings to improve their energy performance?

Shropshire Council agrees with the principle of the proposed revision of existing paragraph 161 of the NPPF, as proposals which retain and adapt existing buildings are often preferable to demolition and replacement. However, as is recognised within the amended text, this requires careful handling in relation to listed buildings and within Conservation Areas. For instance, it is noted that in the explanatory text for the consultation (Chapter 8, para 9) states that *“We have also committed to review the practical planning barriers that households can face when installing energy efficiency measures in their homes, such as improved window glazing and better insulation; and particularly relevant to conservation areas and listed buildings.”* In this respect, there will be a need for additional supporting guidance to provide more clarity to Local Planning Authorities in this area, particularly in terms of how they deal with the balancing exercise when they need to give great weight to the conservation of the heritage asset vs ‘significant weight’ to the energy efficiency measure. It would be particularly helpful if this guidance covered proposals to ‘improve window glazing’ - the Historic Environment Team at Shropshire Council currently spends considerable amounts of time dealing with applications and enquiries for proposals to replace windows on listed buildings and properties subject to Article 4(2) Directions in Conservation with inappropriate uPVC units, and the line is getting ever harder to hold as the window manufacturers improve their products. To a lesser extent, the same applies to solar panels and air source heat pumps.

- 45 Do you agree with the proposed timeline for finalising local plans, minerals and waste plans and spatial development strategies being prepared under the current system? If no, what alternative timeline would you propose?

Shropshire Council agrees with the principle that Local Plans to be prepared under the current framework must be submitted by the end of June 2025, and all those after this date would need to be in line with new legislation and policy.

- 46 Do you agree with the proposed transitional arrangements for plans under the future system? If no, what alternative arrangements would you propose?

Yes. Shropshire Council is supportive of the proposed transitional arrangements, particularly with regard to the proposed 'protection' for Local Planning Authorities, allowing an additional 30-month window where an early update is required (including for SPDs). Such an approach would give Local Planning Authorities confidence of completing their Local Plan update.

The five-year continuous window of drawing up new plans is also considered an appropriate approach.

Shropshire Council also agrees with the proposal that Neighbourhood Plans will also need to adhere to the same timescales as a Local Plan, in terms of the changes in June 2025.

However, to provide certainty it should be explicitly stated that Local Plans are up-to-date for at least 5 years following adoption, plus the 30 month gestation period for a new Local Plan, plus the remainder of any examination period if still ongoing.

- 47 Do you agree with the proposed timeline for preparing neighbourhood plans under the future system? If no, what alternative timeline would you propose?

Yes. Shropshire Council agrees that Neighbourhood Plans as a part of the Development Plan should be subject to the same timelines as a Local Plan.

- 48 Do you agree with the proposed transitional arrangements for supplementary planning documents? If no, what alternative arrangements would you propose?

Shropshire Council welcomes the proposed that new Supplementary Plans will be given more weight within the decision making process. The proposed timescales for new Supplementary Plans is considered acceptable.

49 Do you agree with the suggested scope and principles for guiding National Development Management Policies?

Shropshire Council agrees with the principle that the National Development Management Policies are to become statutory rather than significant material considerations as this will, as implied, aid decision making as it would assist in making the basis of decisions clearer. Such an approach would likely reduce the number of Development Management policies needed within a Local Plan, thus making the whole plan-making process more expedient.

Also agree that such National Development Management Policies should only cover matters that have a direct bearing on the determination of planning applications – this would allow for Local Plan Development Management policies to give their own take on what is acceptable at a more local level.

There is, however, a need to ensure the primacy of Local Plans and recognise the diversity of the country. As such, there should be specific acknowledgement of the ability for Local Planning Authorities to expand upon National Development Management Policies where appropriate within their Local Plans – this would be an expansion rather than a duplication to reflect local circumstances.

50 What other principles, if any, do you believe should inform the scope of National Development Management Policies?

Shropshire Council strongly considers that to ensure the primacy of Local Plans and recognise the diversity of the country there must be explicit acknowledgement of the ability for Local Planning Authorities to expand upon the National Development Management Policies where appropriate within their Local Plans. Such expansion must of course not represent duplication, but rather reflect local dimensions of relevant issues.

Equally, there should be explicit acknowledgement that Local Planning Authorities can address other matters not addressed within National Development Management Policies within their Local Plans. Without such acknowledgement there could be confusion/uncertainty as to whether the lack of National Development Management Policies on a particular issue is intentional and as such there is no need for such policies at a local level.

51 Do you agree that selective additions should be considered for proposals to complement existing national policies for guiding decisions?

Presumably the selective additions alluded to are the 3 outlined in the table provided (i.e. Carbon reduction in new developments, Allotments, and Housing in town centres and built-up areas). It would be helpful if the entire list was provided, as this is confirmed as being non-exhaustive – Shropshire Council would then be able to provide a more comprehensive response to this question.

Nonetheless as a concept this is supported, as it would reduce the amount of Development Management Policies needed at the Local Plan level. Our responses to questions 49 and 50 expand on this further.

52 Are there other issues which apply across all or most of England that you think should be considered as possible options for National Development Management Policies?

Shropshire Council would suggest that for consistency there is an opportunity to integrate the development management and policy components of the Planning Policy for Traveller Sites (PPTS) into the National Development Management Policies, whilst continuing to allow for a localised response to both needs assessments and development strategies to ensure sufficient accommodation.

Shropshire Council would also strongly suggest that a national policy on the issue on nutrient neutrality in relevant catchments (including the catchment of the River Clun which is primarily in Shropshire Council's administrative area) would be of great benefit and ensure consistency of understanding and approach across the country.

53 What, if any, planning policies do you think could be included in a new framework to help achieve the 12 levelling up missions in the Levelling Up White Paper?

Shropshire Council would welcome a change in the policy framework to determine the employment land requirement and the supply of land and premises in a manner similar to the housing policy framework. This amended policy framework should focus greater attention on determining the scale of development needs, the location and distribution of investment opportunity, the density of development, the build quality and the suitability for use and its adaptability to changing market demands.

The knowledge and experience gained through the Covid-19 pandemic and the initial period of recovery through the past few years has been of great value. This has highlighted the need for a greater capacity to respond quickly and flexibly to complex, changing circumstances at the national and regional level and also locally to respond to challenges and new opportunities arising from both effective planning strategies and from changing market demands and investment choices. A review of the Framework to reshape the existing 'Building a strong competitive economy' policies should consider the scope and direction of these new policies and the mechanisms for their implementation. This should facilitate effective responses to changing circumstances and support the capacity to respond quickly and flexibly to new opportunities and investment prospects. Such an approach should also be reflected within any National Development Management Policies.

National policy should strengthen the protection of employment land and premises for a preferred range of employment uses to be advocated within the Framework, Practice Guidance and the Use Classes Order. This strengthened protection should apply to new land and existing floorspace (premises) subject to demonstrable qualitative factors to include age, build quality, suitability, availability, critical mass and viability. This re-evaluation of the policy to build a strong competitive economy critically should clarify the scope and focus of Class E (following the amendment below) to target a narrower range of uses and the permitted development rights to principally support the viability and regeneration of town centres within the Levelling Up Missions.

It is considered beneficial for the ongoing positive plan making and for and protection of employment land, some employment types could be reclassified from Class E to Class B within the Use Class Order, and for this to be reflected in the NPPF and Practice Guidance. In particular, we consider this change should focus on current subset (G) for employment uses in (i) business office

uses, (ii) Research & Development and (iii) light industrial uses and subset (C) for commercial uses for (i) financial services (ii) professional services and (iii) services appropriate to commercial, business or service localities.

54 How do you think that the framework could better support development that will drive economic growth and productivity in every part of the country, in support of the Levelling Up agenda?

Shropshire Council would welcome a further research series into the economic forecasting for the UK economy to provide greater understanding of both the national and regional investment potential and to assess post-Covid 19 recovery trends and prospects for key sectors and markets in the UK or global economy. This research could also offer important insights into key and emerging sectors and how the needs of these sectors can be effectively planned and met across the UK. This should provide an important benchmarking position for the key economic missions for the Levelling Up Agenda and provide a foundation for the proposed full review of the Framework to reshape the existing 'Building a strong competitive economy' policies and to align these more closely with the economic vision in the Levelling Up White Paper.

Shropshire Council welcomes the mission to increase the delivery of skills training to equip people for participation in the separate but related mission to increase employment, productivity and pay in order to close the gap in economic performance across the UK economy. To ensure the success of both of these missions, it is considered that measures will be required to counter the ageing demographic in the UK and to address the inequitable spatial distribution of the ageing population. This is likely to require provisions and incentives to persuade economically active people in certain age cohorts to remain in their current employment or to seek redeployment as an alternative to early retirement or retirement on attaining their statutory pensionable age. These provisions and incentives will be necessary to maintain their continuing participation in the economy to harness their contribution to the national drive to increase the performance and productivity of the UK economy.

Shropshire Council welcomes the mission to boost public investment in R&D and to lever in private sector investment in the long term to stimulate investment and productivity. To ensure the success of this mission, it is considered that measures will be required to support the provision of strategic and local infrastructure to access, layout and service new employment land and deliver market ready plots in locations where performance needs a boost to close the gap with the best performing areas of the UK. Business investment in the growth and diversification of enterprises can be frustrated by the need for but lack of market ready locations and plots that are capable of accommodating their investment and within the timescale that their investment capital is available to them.

Shropshire Council welcomes the mission to stimulate growth in employment and productivity in all areas of the UK and to close the gap with the best performing areas. To ensure the success of this mission, it is considered that further provisions and incentives will be needed to support public and private investments in the provision of modern business and industrial floorspace. This is particularly important where there are 'gap funding' limitations to the delivery of the floorspace or to the provision of the required scale of development within less well performing areas of the UK.

- 55 Do you think that the government could go further in national policy, to increase development on brownfield land within city and town centres, with a view to facilitating gentle densification of our urban cores?

Shropshire Council is supportive of the effective use of under-utilised brownfield land. However, there may be a risk of 'ousting' other productive uses of land, particularly retail and employment. In order to avoid 'dormitory settlements' it is important that a balanced mix of housing, employment, services and facilities, and infrastructure is provided.

- 56 Do you think that the government should bring forward proposals to update the framework as part of next year's wider review to place more emphasis on making sure that women, girls and other vulnerable groups in society feel safe in our public spaces, including for example policies on lighting/street lighting?

Yes.

- 57 Are there any specific approaches or examples of best practice which you think we should consider to improve the way that national planning policy is presented and accessed?

No comment

- 58 We continue to keep the impacts of these proposals under review and would be grateful for your comments on any potential impacts that might arise under the Public Sector Equality Duty as a result of the proposals in this document.

No comment