



Committee and Date

Item

Public



Government Consultation on Draft National Planning Policy Framework – Shropshire Council Response

Responsible Officer:	Mark Barrow: Executive Director of Place		
email:		Tel:	
Cabinet Member (Portfolio Holder):	Cllr Chris Schofield		

1. Synopsis

Government has published a consultation seeking views on their proposals to change the National Planning Policy Framework (NPPF) and associated reforms to the planning system. Appendix 1 to this report sets out the Council’s proposed response, which this report seeks to agree.

2. Executive Summary

2.1. Government is currently consulting on proposed reforms to the National Planning Policy Framework (NPPF) and associated reforms to the planning system. This report seeks consideration of and approval to submit the Council’s proposed response to this consultation.

2.2. This response seeks to ensure that proposed changes to the NPPF and associated reform of the planning system align with and support the achievement of sustainable development in Shropshire and through this the Shropshire Plan.

2.2.1. Healthy People: Delivering the right number, type, size and tenure of housing to meet the housing needs of our communities in appropriate locations which benefit from appropriate access to services, facilities and infrastructure.

- 2.2.2. Healthy Economy: Supporting the principle of economic growth but promoting the alignment of identified key growth sectors with both the national and local economy.
- 2.2.3. Healthy Environment: Seeking to ensure that levels and location of growth give appropriate consideration to the achievement of high-quality design and impact on our built and natural environment.
- 2.2.4. Healthy Organisation: Seeking to minimise the resource implications for the Shropshire Council Planning Services. Proposals, if implemented in their current form, would likely have a significant resource and cost implication for Shropshire Council's Planning Services.
- 2.3. The NPPF is an important national document, which sets out Government's planning policies for England. These policies establish requirements for plan making and form an important material consideration when determining planning applications. More recently, planning reform has been cited by the new Government as a central element to their wider economic growth aspirations. The acknowledgment of planning's importance is welcomed, and in responding to these proposals it is important to remember that the role of planning is ultimately to benefit local communities.
- 2.4. Proposed changes to the NPPF have been made on a regular basis over the last few years. Whilst the status and principal structure of the NPPF have remained consistent, these new proposals have led to intense public interest as they relate to some inherently controversial issues. Most notably, this has tended to focus on the scale of housing need for local areas defined through a standard methodology, and the onus on areas seeking to address this need.
- 2.5. The current consultation again focusses on this issue. They propose to require Councils to seek to meet their identified housing need and propose a new standard methodology for identifying housing need. This methodology would represent a significant change in Shropshire, increasing housing need from 1,070 dwellings per year (as under the current methodology) to **2,059 dwellings per year, an increase of 989 dwellings per year.**
- 2.6. The current consultation also addresses a number of other relevant areas, notably, the impact on status of Green Belt, delivery of affordable housing, design of development, green energy and employment.
- 2.7. Importantly, it is worth noting from the outset that despite the significant implications of these proposals, proposed transitional arrangements are clear that the Council will be able to continue to progress positively with the ongoing Examination of the Local Plan, and subject to any issues identified through this process, will be able to move to adopt the Local Plan in 2025 following planned public hearing sessions in the October – December 2024. It is considered that progression of this Examination is critical in order to provide the certainty of a recently adopted housing requirement and policy framework.
- 2.8. Appendix 1 to this report sets out the Council's proposed response to the consultation questions. This officer report seeks approval for this response to be

submitted to the Ministry of Housing, Communities and Local Government (MHCLG) by the deadline of 24th September.

3. Recommendations

- 3.1. Cabinet consider and approve submission of the response to the Government's consultation on reforms to the National Planning Policy Framework (NPPF) and associated reforms to the planning system, as set out in Appendix 1 to this report.
- 3.2. That authority be given to the Executive Director of Place in consultation with the Portfolio Holder for Planning and Regulatory Services to agree any additional changes to the Council's response to the consultation ahead of its submission to the Government before 24 September 2024.

Report

4. Risk Assessment and Opportunities Appraisal

- 4.1. It is considered that the recommendations within this report do not pose a significant risk to the Council, as they relate to seeking approval to submit a response to Government's consultation on proposed reforms to the National Planning Policy Framework (NPPF) and associated reforms to the planning system. Rather these recommendations provide an opportunity to contribute to positively shaping proposed reform of the NPPF and associated reform of the planning system.
- 4.2. However, it is important to note that the proposed reforms to the NPPF and associated reforms to the planning system, if implemented in their current form, will likely have a very significant impact on Shropshire Council's Planning Services.
- 4.3. With regard to the Development Management service, the key issue is that proposals would likely to lead to an increase in the number and complexity of speculative planning applications and planning appeals, which has resource and cost implications. The proposed response to this consultation seeks to mitigate this risk by proposing changes to the standard methodology for calculating housing need and suggesting clearer transitional arrangements on the issue of housing land supply. If changes are introduced in their current form, one mechanism to seek to mitigate risk will be to adopt the draft Shropshire Local Plan (currently the subject of examination) as expeditiously as possible, in order to provide the certainty of a recently adopted housing requirement and policy framework.
- 4.4. With regard to the Planning Policy Service, whilst it is considered unlikely that the proposals place a significant risk to the timeframe for the adoption of the current draft Shropshire Local Plan (currently at examination), as a result of the proposed transitional arrangements there is a significant risk to the Council that it would need to progress a further Local Plan review at the earliest opportunity, which has resource and cost implications. The proposed response to this consultation seeks to mitigate this risk by suggesting more appropriate transitional arrangements and

encouraging Government to provide financial and resource support to Local Authorities required to undertake early reviews of their Local Plan.

- 4.5. Whilst providing positive feedback on several areas of the Government's proposals, the proposed response is raising some very significant concerns on several key areas, notably the proposed new standard methodology for calculating housing need, the definition of Grey Belt within the Green Belt, and the proposed transitional arrangements. It is hoped that a positive response from the Government to these concerns will act to mitigate some of the risk to Shropshire Council.
- 4.6. There are also potential opportunities to some of the proposals, which respond well to both the objectives of the emerging Shropshire Local Plan, the Economic Growth Strategy and the Shropshire Plan.

5. Financial Implications

- 5.1. Shropshire Council is currently managing an unprecedented financial position as budgeted for with the Medium-Term Financial Strategy approved by Council on 29 February 2024 and detailed in our monitoring position presented to Cabinet on a monthly basis. This demonstrates that significant management action is required over the remainder of the financial year to ensure the Council's financial survival. While all Cabinet Reports provide the financial implications of decisions being taken, this may change as officers review the overall financial situation and make decisions aligned to financial survivability. Where non-essential spend is identified within the Council, this will be reduced. This may involve
- scaling down initiatives,
 - changing the scope,
 - delaying implementation, or
 - extending delivery timescales.
- 5.2. It is considered that the recommendations within this report do not have a significant financial implication for the Council, as they relate to seeking approval to submit a response to Government's consultation on proposed reforms to the National Planning Policy Framework (NPPF) and associated reforms of the planning system. Rather these recommendations provide an opportunity to contribute to positively shaping proposed reform of the NPPF and associated reform to the planning system.
- 5.3. However, it is considered that the proposed reforms to the National Planning Policy Framework (NPPF) and associated reforms to the planning system, if enacted in line with the draft proposals, are likely to have an impact on both the number of planning applications received and the timeframe for future reviews of the Local Plan. Both these are likely to have financial implications on the Council in how they seek to respond effectively to these demands.
- 5.4. With regard to future Local Plan reviews, the key implication of the proposal for Shropshire would be the need to progress to an early review "*at the earliest opportunity*" following the adoption of the current Local Plan subject to ongoing Examination in Public, and likely to be adopted in Spring 2025. This is much

earlier than the current expectation to move to a review within five years of adoption, and therefore will inevitably place an earlier and ongoing requirement to adequately resource this process. The key financial implications for Plan making from a financial perspective, aside from staff costs, are the need to maintain an up-to-date evidence base, and the cost of the Examination process; both of which can be significant (likely to be between £300-500k).

- 5.5. The previous Government consulted on changes to plan making system which sought to streamline the process, which would, in theory, reduce some of the costs. These changes were not implemented and this current consultation does not address this issue directly. We would therefore expect further information on plan making reform to be forthcoming in the near future. Ahead of this, there remains uncertainty over the financial implications to the authority of undertaking an early Plan review as envisaged by the draft proposals.
- 5.6. The proposed response to this consultation seeks to mitigate this issue by suggesting more appropriate transitional arrangements for plan making and encouraging Government to provide financial and resource support to Local Authorities required to undertake early reviews of their Local Plan.
- 5.7. With regard to the impact on planning applications, it is considered the draft proposals have the potential to lead to an increase in speculative planning applications, especially for major residential development. This will lead to an additional burden on the Council's Planning service, both through the processing and determination of applications, but also potentially over an increase in planning appeals. The Council's proposed response to the consultation, particularly regarding the proposed change to the standard housing methodology for calculating housing need and transitional arrangements, may lead to changes which could mitigate this impact to an extent.
- 5.8. More positively, the consultation also seeks views on a number of areas around planning application fees, with a view to seeking appropriate increases to either achieve cost recovery or more closely align fees with costs. This includes proposed increases to householder fees. In principle, the proposed response is supportive of appropriate increases to planning application fees and to some extent this will mitigate the likely impacts of increased numbers of applications and appeals, although there remains considerable uncertainty over the precise impact this will have in practice.
- 5.9. The Council will need to monitor this carefully to ensure the Planning service remains appropriately resource to respond to these challenges.

6. Climate Change Appraisal

- 6.1. The proposed changes to the National Planning Policy Framework (NPPF) and associated reforms to the planning system, include a range of proposals to support the implementation of renewable and low carbon energy technologies, including through the identification of opportunity areas as part of the Local Plan preparation process.

- 6.2. The Council's proposed response in Appendix 1 of this report is generally supportive of the principle of these proposed amendments, although it recommends this process gives suitable consideration to impact upon natural and historic assets, such as the Shropshire Hills National Landscape.
- 6.3. Further information on the issue is provided within Section 7 of this report.

7. Background

- 7.1 The National Planning Policy Framework (NPPF) is an important national document, which sets out Government's planning policies for England. These establish requirements for plan making and form an important material consideration when determining planning applications. More recently, planning reform has been cited by the new Government as a central element to their wider economic growth aspirations. The acknowledgment of Planning's importance is welcomed, and in responding to these proposals it is important to remember that the role of planning is ultimately to benefit local communities.
- 7.2 Proposed changes to the NPPF have been made on a regular basis over the last few years. Whilst the status and principal structure of the NPPF have remained consistent, these new proposals have led to intense public interest as they relate to some inherently controversial issues. Most notably, this has tended to focus on the scale of housing need for local areas defined through a 'standard methodology' defined at a national level, and the onus on areas seeking to address this need. The current consultation again focusses on this issue, but also addresses a number of other relevant areas, notably, the impact on status of Green Belt, delivery of affordable housing, design of development, green energy and employment.
- 7.3 The consultation documents can be viewed via this link [Proposed reforms to the National Planning Policy Framework and other changes to the planning system - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/proposed-reforms-to-the-national-planning-policy-framework-and-other-changes-to-the-planning-system). Appendix 1 to this report sets out the Council's proposed response to the consultation questions. This officer report seeks approval for this response to be submitted to the Ministry of Housing, Communities and Local Government (MHCLG) by the deadline of 24th September.
- 7.4 This report focuses on a number of headline issues identified which are likely to have implications for Shropshire. Proposed transitional arrangements are discussed below, but it is worth noting from the outset that despite the significant implications of the new proposals, the Council will be able to continue to progress positively with the current Examination into the Local Plan, and subject to any issues identified through this process, will be able to move to adopt the Local Plan in 2025 following planned public hearing sessions in the October – December 2024.

Principle of Meeting Housing Needs and New Standard Methodology

- 7.5 New paragraphs 61 and 62 of the draft NPPF continue to state that strategic planning policies should be informed by a local housing need assessment conducted using the Government's standard methodology, but importantly removes the reference to the standard methodology being 'an advisory starting

point' as well as removing the reference to the ability of Councils to use 'exceptional circumstances' to argue for the use of alternative approaches to assess need. The proposals also emphasise that Councils should seek to meet their identified housing need, rather than seeking to meet as much as possible.

- 7.6 Shropshire Council has always responded positively in seeking to meet its own identified housing needs, and generally there has been an aspiration to exceed these identified needs where possible in order to maximise opportunities for sustainable economic growth and enabling additional much needed affordable housing for our communities. The general principle of Councils seeking to meet their own housing need is therefore broadly supported.
- 7.7 However, this 'in principle' support does of course rely upon a sensible, credible and sustainable local housing need figure, and one which is capable of being delivered consistently. To this end there are very significant concerns regards the calculation of the new proposed standard methodology used to define local housing need, and the outcome of this exercise.
- 7.8 As things stand the current method for calculating housing need arrives at 1,070 dwellings per year. Under the proposed new methodology **this raises to 2,059 dwellings per year; an increase of 989 dwellings per year**. Clearly this is of great significance, and if implemented would have significant implications on future Local Plan review preparation, not least on the need for additional supporting infrastructure, the impact this would have on the local character, and the potential unsustainable impact on existing settlements.
- 7.9 This level of proposed housing need increase is not unique to Shropshire. Generally the impact of the new proposed standard methodology is to increase significantly levels of housing need in areas outside major urban areas, where generally housing need is proposed to reduce. For instance, in the West Midlands region, only Birmingham and Coventry are proposed to see a reduction in housing need. The impact of this nationally is to see an annual housing need of around 370,000 dwellings per year.
- 7.10 The proposed response set out in Appendix 1 to this report raises **very significant concerns** regarding the new proposed standard methodology for the calculation of housing need, and in doing so proposes an alternative approach which is more responsive to the character and market in Shropshire. This full response is included in Chapter 4 of Appendix 1 to this report. In summary:
- 7.10.1 The Council has very significant concern about the ability of the area to consistently deliver over 2,000 dwellings per year. To put this in context Shropshire has never achieved such levels of delivery, and instead generally delivers between 1,400 to 1,500 dwellings on average in a sustainable manner.
- 7.10.2 There appears to be no rationale provided to justify the proposed affordability ratio uplift applied to the proposed standard methodology, which leads to concerns to the overall credibility to the proposals.
- 7.10.3 If the affordability ratio multiplier uplift remains at a level of 0.25% (which we have generally agreed with in past consultations) the Shropshire

housing need would be around 1,560 dwellings per year. It is considered this responds positively to the need to increase housing need levels and for areas to do 'their fair share'. But crucially, this would be at a level which is considered realistically deliverable in the County over a consistent time frame.

- 7.11 It is felt the proposals as set out in the consultation material run the significant risk of undermining the plan-led system. For instance, whilst the principle of the need for Councils to maintain a deliverable supply of land is supported, there are concerns the transitional arrangements proposed leave potentially unhelpful and counterproductive outcomes. As such, it is proposed to raise very significant concerns as it is felt this approach seeks to unduly penalise an authority actively working towards a new Local Plan adoption.

Brownfield Land, Green Belt and Introduction of Grey Belt

- 7.12 A key feature of the proposed changes is the introduction of a new category of Green Belt, called "Grey Belt", which is defined as previously developed land and/or poor performing Green Belt. In addition, the proposals re-introduce the requirement for all Local Planning Authorities to undertake a Green Belt Review as part of their Local Plan preparation where housing need cannot otherwise be met.
- 7.13 The Council's proposed responses to these proposals are included in Chapter 5 of Appendix 1 to this report. In summary:
- 7.13.1 General support for the principle of that brownfield development is acceptable in principle within existing settlements, and potentially acceptable in other locations subject to further considerations.
- 7.13.2 General support for the principle of reviewing Green Belt boundaries as part of a Local Plan process. Indeed, Shropshire is already taking such a proactive approach.
- 7.13.3 General support for the principle of directing necessary development in the Green Belt towards 'poor performing' areas (against the five key principles of the Green Belt).
- 7.13.4 However, there is concern the definition of Grey Belt is confusing as it appears to extend beyond only previously developed land (PDL) to also include areas of which do not strongly perform against the purposes of Green Belt (the two are often very different in practice). As such the Council's response advocates the definition of Grey Belt being restricted to only include PDL and for this to apply consistently throughout the document, whilst also removing some vague and potentially opaque statements regarding the circumstances where Grey Belt land may be appropriate to develop.
- 7.13.5 General support for the proposed 'Golden Rule' that all development in the Green Belt or resulting from the Green Belt release (through a Local Plan process) is subject to 50% affordable housing and provides benefits for nature and public access to green space, although it is recommended the viability considerations resulting in a reduction to affordable housing levels

only apply in exceptional circumstances and greater certainty is provided that such proposals result in greater benefits for nature and public access to green space than other such development.

Delivery of Affordable Housing

- 7.14 In order to support the delivery of affordable housing and in particular to ensure that the affordable housing delivered is of a type and tenure that best meets local needs, the Government is proposing a series of changes within the NPPF.
- 7.15 The Council's proposed response on these matters is captured within Chapter 6 of Appendix 1 to this report. In summary, Shropshire Council is generally supportive of these proposals.
- 7.16 However, the proposed response strongly considers that the NPPF should also be amended to allow for local discretion with regard to site, size and dwelling thresholds for affordable housing contributions – informed by local need and viability. This is an important consideration in rural areas, as current limitations restrict the ability to secure contributions towards affordable housing from smaller scale development.

Design of Development

- 7.17 A number of the proposed reforms to the NPPF address the design of development. These include proposals to remove reference to 'beautiful' places and buildings, which is considered subjective, and instead focus on achievement of well-designed places and buildings. Proposals also include specific reference to locational and design requirements within the context of the presumption in favour of sustainable development.
- 7.18 The recommended response to these proposed changes is detailed within Chapters 3 and 6 of Appendix 1 of this report. This response is generally supportive of this principles, but recommends that greater emphasis is placed on achievement of high-quality design which is responsive to the development site and complementary to its setting.

Infrastructure

- 7.19 The proposed reforms of the NPPF include reference to the need for infrastructure to support economic growth. The Council's proposed response is generally supportive of these proposals, as captured within Chapter 7 of Appendix 1 of this report.
- 7.20 However, the response is concerned about the lack of recognition of the implications of wider proposals, particularly the principle of meeting housing needs and the new proposed standard methodology, on infrastructure capacity and requirements.
- 7.21 As such, the proposed response seeks to emphasise the importance of appropriate consideration of infrastructure capacity when planning for housing development. This is addressed in Chapter 4 of Appendix 1 of this report.

Supporting Green Energy and the Environment

- 7.22 Through a written ministerial statement (WMS) earlier in July 2024, the Government has introduced immediate changes to the process of determining planning applications for on shore wind turbines – specifically Government has removed the requirement for wind energy development to only occur in identified areas and where there is community support. As this change has already been introduced via the WMS it is not the subject of this consultation.
- 7.23 Through the consultation, Government is proposing further changes regarding green energy and the environment. This includes introducing a requirement for decisions on planning applications to give significant weight to the benefits of renewable and low carbon energy generation; and requiring Local Plans to identify opportunity areas for renewable and low carbon energy generation.
- 7.24 The Council's proposed response on these matters is captured within Chapter 9 of Appendix 1 to this report. In summary, it is generally supportive of these proposals.
- 7.25 With regard to the principle of giving significant weight to the benefits of renewable and low carbon energy generation, this support is subject to the achievement of high-quality design; an expectation that proposals minimise impacts on local communities; and an expectation that proposals protect natural and heritage assets (including the Shropshire Hills National Landscape).
- 7.26 With regard to the principle that plans identify opportunity areas for areas for renewable and low carbon energy generation, it is considered Local Authorities are best placed to undertake this process, informed by local knowledge and consideration of known opportunities and constraints.
- 7.27 The opportunity of this consultation has also been utilised to encourage the Government to:
- 7.27.1 Positively consider the interaction between planning and building control on the issue of energy efficiency – in order to ensure that new development is positively contributing towards the reduction of carbon emissions.
 - 7.27.2 Positively consider the interaction between planning and the conveyancing process – in order to reduce the potential for legal covenants being utilised to restrict the ability for households to implement renewable energy technologies.
 - 7.27.3 Consider the introduction of a clear standardised process for carbon accounting in plan making and planning application decision taking. Such a process would also be beneficial for other Council activities.
 - 7.27.4 Ensuring that Biodiversity Net Gain (BNG), which is strongly supported by the Council, is a success rather than a constraint to development, by providing appropriate support and guidance to Local Planning Authorities.

There are also opportunities to streamline the process by which land can come forward to achieve off-site biodiversity net gain – particularly where it is in the ownership of public bodies.

Economic Development

- 7.28 Proposed reforms within to the NPPF also seek to drive greater commercial development. These reforms include greater support (including through specific allocations in Local Plans) for those sectors which are considered to be the future engine of the UK's economy, including Research Laboratories, Gigafactories (electric battery technologies), Digital Infrastructure ('cloud data storage' facilities) and Freight & Logistics Hubs (for moving retailing and e-retailing products or storing wholesale stock).
- 7.29 The proposed response to these proposed changes is detailed within Chapter 7 of Appendix 1 of this report. This response is generally supportive of this principle, but considers the contribution of any key growth sectors to local and national economies needs to be clearly explained. Any allocations in Local Plans must also be informed by local constraints and opportunities.

Transitional Arrangements

- 7.30 As is normal with changes to the NPPF, transitional arrangements are proposed. Generally these are intended to ensure Councils who are making good progress with their plan making are not disincentivised in carrying on the process. As such, these are particularly relevant to Shropshire Council given the very advanced stage of Plan making, which now includes confirmed dates for the second set of hearing sessions of the examination this autumn.
- 7.31 Positively, these transitional arrangements confirm that Local Authorities currently at examination can continue to work towards adoption of their Local Plan and that these examinations will continue to consider consistency with the NPPF relevant at point of submission. It is useful for Cabinet to be aware that the Examining Inspectors into the Shropshire Local Plan have confirmed this position to the Council [id44-inspectors-nppf-consultation-note-august-2024.pdf \(shropshire.gov.uk\)](#)
- 7.32 However, the proposed transitional arrangements also specify that following adoption, in circumstances where the new standard methodology identifies a housing need figures 200 dwellings or more in excess of the Local Plan housing requirement (which under current proposals would be the case in Shropshire), the Local Planning Authority is expected to commence a Local Plan Review utilising the new NPPF "at the earliest opportunity".
- 7.33 As such, the Council's proposed response is one of general disappointment and concern that the proposed transitional arrangements do not go far enough and appear to be internally inconsistent.
- 7.34 The Council's response to the proposed Transitional Arrangements is included in Chapter 12 of Appendix 1 to this report. In summary:

- 7.34.1 It is recognised and welcomed that Local Planning Authorities currently at Examination, such as Shropshire, will be allowed to continue to adoption under the current NPPF arrangements and utilising the existing ‘standard methodology’ to identify local housing need figures and based on the NPPF as at the point of submission.
- 7.34.2 It is felt the expectation to review a Local Plan at the earliest opportunity where the housing requirement is 200 or more dwellings less than the outcome of the new proposed standard methodology could lead to a devaluing of the status of Local Plans, which would run counter both the plan-led principle at the core of the NPPF, and has the potential to lead to the prospect of ‘planning by appeal’ in many areas.
- 7.34.3 As a wider consequence, there is concern such an approach may lead to ‘planning fatigue’ amongst communities.
- 7.34.4 There would be a very real risk of unplanned and unsustainable development.
- 7.34.5 In addition, and looking wider than Shropshire, it is considered these arrangements may have a ‘chilling effect’ on some Local Planning Authorities at an advanced of plan preparation but not yet at Examination, which could undermine Government’s aspiration of full up-to-date Local Plan coverage.
- 7.34.6 There is also concern about the lack of transitional arrangements regarding housing land supply in circumstances where Local Planning Authorities are at advanced stages of Local Plan Reviews.

8. Additional Information

- 8.1. Further information on Governments proposed reforms of the National Planning Policy Framework (NPPF) and other changes to the planning system is available via: <https://gov.uk/government/consultations/proposed-reforms-to-the-national-planning-policy-framework-and-other-changes-to-the-planning-system>

9. Conclusions

- 9.1. Government is currently consulting on proposed reforms to the National Planning Policy Framework (NPPF) and associated reforms to the planning system. This report seeks consideration of and approval to submit the Council’s proposed response to this consultation.
- 9.2. The consultation includes a significant focus on the issue of housing need – including expectations that Local Authorities should seek to meet their housing needs and a new proposed standard methodology for assessing need. It also addresses a number of other relevant areas, notably, the impact on status of

Green Belt, delivery of affordable housing, design of development, green energy and employment.

- 9.3. Responding to this consultation is considered important as it provides the opportunity to seek to influence proposed changes in order to help shape the positive reform of the NPPF and associated planning system.
- 9.4. Whilst providing positive feedback on several areas of the Government's proposals, the Council are proposing to raise some very significant concerns on several key areas, notably the proposed new standard methodology for calculating housing need, the definition of Grey Belt, and the proposed transitional arrangements.
- 9.5. Appendix 1 to this report sets out the Council's proposed response to the consultation questions. This officer report seeks approval for this response to be submitted to the Ministry of Housing, Communities and Local Government (MHCLG) by the deadline of 24th September.
- 9.6. However, it is important to note that proposed transitional arrangements are clear that the Council will be able to continue to progress positively with the ongoing Examination of the Local Plan, and subject to any issues identified through this process, will be able to move to adopt the Local Plan in 2025 following planned public hearing sessions in the October – December 2024. It is considered that progression of this Examination is critical in order to provide the certainty of a recently adopted housing requirement and policy framework.

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

Local Member: *All*

Appendices:

Appendix 1: Shropshire Council's Proposed Response to Government's Consultation on Proposed Reforms to the National Planning Policy Framework and Other Changes to the Planning System