



Cabinet
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Item

Public



Shropshire Council response to draft National Planning Policy Framework (NPPF)

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1. Synopsis

Government has published a consultation seeking views on their proposals to change the National Planning Policy Framework (NPPF). Appendix 1 to this report sets out the Council’s proposed response, which this report seeks approval to from Cabinet.

2. Executive Summary

2.1 The National Planning Policy Framework (NPPF) is an important national document, which sets out Government’s planning policies for England. The Government is seeking consultation responses on a new draft version of the NPPF by March 10th, although due to Cabinet dates, MHCLG have agreed that Shropshire submit their response by 12th March.

2.2 The stated aims of MHCLG for the proposed changes to the NPPF are to:

- Ensure national planning policy is accessible and understandable for everyone who uses it;
- Establish a comprehensive suite of national policies on general planning matters which will apply across the country, to avoid these matters being repeated or deviated from in locally-produced plans; and

- Make the policy which it contains more ‘rules-based’ and certain, and so more capable of supporting timely and consistent planning.
- 2.3 The Council’s proposed response to this Consultation is included in Appendix 1 to this report. Whilst largely positive of many of the proposed changes to the NPPF, the Council’s response does highlight a number of areas where we are seeking changes and/or points of clarification.

3. Recommendations

That Cabinet

- 3.1. approve the 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. delegate authority to the Service Director for Legal, Governance and Planning in consultation with the Portfolio Holder for Planning to agree any minor additional changes to the Council’s response to the consultation ahead of its submission to the Government before 12th March 2026.

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, a key issue is 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. If changes are introduced in their current form, it will be important to

progress the new Local Plan towards adoption as early as possible in order to mitigate the impact of speculative development.

5. Financial Implications

- 5.1. Shropshire Council continues to manage unprecedented financial demands and a financial emergency was declared by Cabinet on 10 September 2025. The overall financial position of the Council is set out in the monitoring position presented to Cabinet on a monthly basis. Significant management action has been instigated at all levels of the Council reducing spend to ensure the Council's financial survival. While all reports to Members provide the financial implications of decisions being taken, this may change as officers and/or Portfolio Holders review the overall financial situation and make decisions aligned to financial survivability. All non-essential spend will be stopped and all essential spend challenged. These actions may involve (this is not exhaustive):
- scaling down initiatives,
 - changing the scope of activities,
 - delaying implementation of agreed plans, 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 type and frequency of reviews to the development plan. Both these are likely to have financial implications on the Council in how they seek to respond effectively to these demands.
- 5.4. From a Plan making perspective, the draft NPPF formally introduces the concept of the shorter, more efficient '30 month' plan making process. Policies PM2 and PM15 of the Draft NPPF establish the expectations on LPA's in preparing and being subject to independent examination on Local Plans.
- 5.5. Whilst the statutory nature and related financial implications of Local Plan making is already well established, the draft NPPF (alongside the recently enacted Planning and Infrastructure Act) does introduce the new statutory provision on 'strategic planning authorities' (such as Shropshire Council) to formally prepare a Spatial Development Strategy (SDS). This new statutory element of the Development Plan will inevitably require additional resource. Whilst it is considered these two complementary plan making processes will share aspects of evidence, it should also be recognised an SDS is subject to a separate Independent Examination process, which will be an additional financial burden.

- 5.6. The Government are currently consulting on the geographic scope of SDS's, in a separate consultation process. As there remains a lot of uncertainty about the scope of an SDS for Shropshire, the degree of financial risk remains unclear. Indeed, it should also be recognised a key objective of an SDS is to support economic growth and to support inward investment. At this stage therefore the Council's proposed response to the role and content of SDS's is largely positive, whilst also raising the issue of resourcing such a process.

6. Climate Change Appraisal

- 6.1. The draft National Planning Policy Framework (NPPF) reaffirm the purpose of the planning system, by managing the use and development of land in the long term public interest. In doing this the draft NPPF includes Chapter 5 - meeting the challenge of climate change, with the stated objective to support the transition to net zero by 2050, and establishing national policies to shape places in ways that contribute to radical reductions in greenhouse gas emissions and adapt to the full range of current and potential impacts of climate change.
- 6.2. Most notably, draft Policy CC1 – Planning for Climate Change – would require Local Planning Authorities in their Development Plans (such as Local Plans and Spatial Development Strategies) to take a proactive approach to adapting to climate change through the development patterns they promote in their spatial strategy and site allocations; addressing any site specific risks from climate change in their site allocations; setting water efficiency standards for new development where justified by evidence; and identifying opportunities for green infrastructure provision and nature based solutions which can safeguard and improve carbon storage, support nature recovery and resilience, and which take account of Local Nature Recovery Strategies.
- 6.3. The Council's proposed response to Policy CC1 is included at Q42 in Appendix 1 to this report. It is largely positive, although it does highlight the additional resource burden on the Council in fulfilling these requirements, most notably the expectation that Councils undertake baseline assessments of carbon emissions and the potential effect of development options on future emissions and mitigation. In addition, national decision making policies CC2 – mitigation of Climate Change - and CC3 – Adaptation to Climate Change are both positively supported.

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. The Government is seeking consultation responses on a new draft version of the NPPF by March 10th, although due to Cabinet dates, MHCLG have agreed that Shropshire submit their response by 12th March.

- 7.2. The NPPF was last amended by MHCLG in December 2024. This introduced a number of significant changes to national planning policy such as the concept of grey belt and the principal of areas meeting their own nationally defined housing needs. This current consultation provides additional changes to both the layout and content of the NPPF.
- 7.3. It remains the government's stated mission to support economic growth and to tackle the Country's housing crisis. The recognition of the continued importance of planning in meeting these missions is welcomed. In responding to these proposals it is important to remember that the role of planning is ultimately to benefit local communities.
- 7.4. The stated aims of MHCLG for the proposed changes to the NPPF are to:
- Ensure national planning policy is accessible and understandable for everyone who uses it;
 - Establish a comprehensive suite of national policies on general planning matters which will apply across the country, to avoid these matters being repeated or deviated from in locally-produced plans – in so doing helping to speed up their preparation and preventing an unnecessary increase of different standards that can complicate development; and
 - Make the policy which it contains more 'rules-based' and certain, and so more capable of supporting timely and consistent planning – especially in those places where development is most desirable, where national policy should provide for a default "yes" to the principle of development.
- 7.5. MHCLG have specifically asked for responses to an extensive and significant range of questions, covering all areas of the document. Given the extensive number of questions, it has been necessary for priority to be given to areas of most direct importance to Shropshire.
- 7.6. Of most significance, the draft NPPF is proposing the following:
- The continuation of a plan-led approach to Planning, with the preparation and maintenance of up-to-date development plans being a priority in order to provide housing and other development in a sustainable manner;
 - The maintenance of non-statutory national development management policies (i.e. not part of the formal Development Plan for the area);
 - However, the intention that where current development plan policies established by Local Planning Authorities conflict with the new national development management policies, these local policies should carry only limited weight in planning decisions;
 - That national development management policies should not be replicated by emerging Development Plans, which is likely to lead to a more limited scope of local plan policies being developed by LPAs;
 - A clear separation between national plan making policies and decision-making policies in the layout of the document;
 - Further to the Planning and Infrastructure Act (Dec 2025) that the preparation of Spatial Development Strategies (SDSs) by strategic planning authorities is

now a formal part of the statutory development plan for an area. The new style SDSs should be 'genuinely strategic in nature' and would therefore supplement and not replace the role and purpose of Local Plan prepared by the Local Planning Authority as a statutory requirement;

- Confirmation of a 30 month preparation process for Local Plans to be prepared under the new system, to be commenced upon the agreement of national secondary legislation;
- Seeking a more focussed Local Plan process with defined outputs, a proportionate evidence base, and a clear focus on areas meeting their own development needs;
- An amended version of the '*presumption in favour of sustainable development*' which introduces greater locational policies to guide and manage new development within and outside settlements. This would include a presumption in favour of sustainable development for proposals within reasonable walking distance of a railway station which meets defined criteria.

7.7. In addition, and of importance, the draft NPPF continues to require Local Authorities, through the preparation of both Spatial Development Strategies and Local Plans, to establish a minimum housing need in line with the Government's Standard Methodology. It is also clear that to ensure the preparation of 'sound' Spatial Development Strategies and Local Plans, there is an expectation that both these documents positively set out strategies which meet defined local needs.

7.8. Appendix 1 to this report provides the Council's proposed comprehensive response to this report. Whilst there is general agreement with many of the changes proposed, a number of areas have been highlighted where changes and/or clarifications are being sought.

7.9. The following are key points from the proposed Council response:

7.9.1. Support is given to the principle of new style Spatial Development Strategies (SDSs), although in Shropshire's case the geographic area for where this would apply and the partner authorities this would include, are yet to be determined. More clarity is also needed on the resourcing of the SDS, as this should not distract from the core importance of preparing the Local Plan.

7.9.2. The principle of separating 'plan making policies' and 'national decision making policies' is supported, although the intention not to make these national decision making policies statutory is curious, and seems to be in conflict with wider planning law regarding the process of taking a decisions on planning applications.

7.9.3. The introduction of the 'presumption in favour of sustainable development' to all decisions is partly agreed, but amendments for clarification are sought, including the incorporation of greater emphasis on the need for this principle to support sustainably designed and located development more explicitly;

7.9.4. It is strongly considered there is a need for the draft NPPF to confirm that the definition of 'settlement' should relate to those locations defined in a development plan;

7.9.5. There are strong concerns relating to the proposals related to the principal of development outside settlements, and that there should be a greater emphasis on the development plan being the primary consideration to guide the location, scale and type of development in these locations.

7.9.6. Whilst it is recognised the presumption in favour of sustainable development outside settlements is proposed to be expanded to include the development of housing and mixed use development within reasonable walking distance of a railway station, it is acknowledged that in applying the criteria included in footnote 26 of the draft NPPF, this would not currently relate to any train stations located in the Shropshire Council area.

7.9.7. That the NPPF should provide more flexibility to Local Authorities in setting policies for appropriate mix of tenures in new development, especially in large rural areas where many sites are likely to be under the proposed 150 dwelling threshold;

7.9.8. The specific reference to supporting the needs of rural business development is welcomed, but that clarifications are required to enable more positive considerations of such proposals.

7.10. Subject to agreement by Cabinet, the Council's full response (Appendix 1) will be submitted to MHCLG by the 12th March. MHCLG will consider all responses before publishing a final version of the NPPF; likely to be late Spring or early Summer 2026.

8. Conclusions

8.1. The Council's proposed response to the Government's draft NPPF is included in Appendix 1 to this report.

8.2. Whilst there is broad support for elements of the new NPPF, the Council's response highlights some areas of concern and / or need for further clarification, especially regarding the Government's proposed new approach to the application of the '*presumption in favour of sustainable development*'.

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 [Please list the titles of Appendices]

Appendix 1 – Shropshire Council Proposed Response to the National Planning Policy Framework and other changes to the planning system
