

Parish and Town Council – Planning Guidance Note October 2025

1. Introduction

- 1.1 It is recognised there is currently some confusion over how Parish and Town Councils should most appropriately respond to planning applications in their area.
- 1.2 This has resulted from the recent national changes to the planning system, notably the revisions to the National Planning Policy Framework (NPPF) and the changes to the national housing need calculation (the Standard Methodology) in December 2024. It has also resulted from the withdrawal of the draft Local Plan from Examination in July 2025.
- 1.3 This short guidance note has been prepared by Shropshire Council Planning Officers and is intended to provide an advisory starting point to be used by Parish and Town Councils. However, it clearly remains the role of Parish and Town Councils to respond to planning applications in the way they feel most appropriate to represent their local area.

2. Decision making framework

- 2.1 The decision making framework for determining planning applications, which Shropshire Council **must** adhere to, is established in Section 38(6) of the Planning and Compulsory Purchase Act 2004.
- 2.2 This requires that “*where in making any determination under the planning Acts, regard is to be had to the development plan, the determination shall be made in accordance with the plan unless material consideration indicates otherwise*”.
- 2.3 The current adopted Development Plan for Shropshire is made up of the following:
 - **The Core Strategy** – adopted 2011
 - **The Site Allocations and Management of Development (SAMDev) Plan** – adopted 2015
 - Any relevant ‘made’(adopted) **Neighbourhood Development Plans** are also part of the Development Plan for the area which it covers
- 2.4 The Core Strategy and SAMDev Plans cover the period 2006-2026. However, after 2026 these will remain the adopted Development Plan for the area until replaced by a



new Local Plan. This means that after 2026, these Plans will still be the starting point for decision making on planning applications, alongside any adopted Neighbourhood Development Plans for the area.

- 2.5 **However, and of importance**, whilst the adopted development plan remains the starting point for decision making, the **‘weight’** that can be applied to it in decision making depends on a number of material considerations, including (but not restricted to):
- The National Planning Policy Framework (NPPF) and its associated guidance (NPPG);
 - The age of the development plan;
 - The housing land supply position;
 - The housing delivery rate;
 - Relevant adopted Supplementary Planning Documents (SPDs), Design guidance or other interim guidance notes
 - Any other material local factors, which could be important to the decision.

3. The National Planning Policy Framework and Guidance (NPPF and NPPG)

- 3.1 The NPPF is a significant material consideration for both plan making and decision making on planning applications. It can be viewed here [National Planning Policy Framework](#). Indeed, paragraph 2 of the NPPF states:

“the NPPF must be taken into account in preparing the development plan, and is a material consideration in planning decisions”

- 3.2 The NPPF also establishes the context for the **‘weight’** that can be applied to any adopted development plan policies. Paragraph 11 of the NPPF sets this out as follows:

“Plans and decisions should apply a presumption in favour of sustainable development...”

For decision-taking this means:

c) approving development proposals that accord with an up-to-date development plan without delay; or

*d) where there are no relevant development plan policies, **or the policies which are most important for determining the application are out-of-date** , granting permission unless:*

i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed; or



ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.” (my emphasis)

- 3.4 The NPPF defines a development plan as being ‘out of date’ when:
“situations where: the local planning authority cannot demonstrate a five year supply of deliverable housing sites...; or where the Housing Delivery Test indicates that the delivery of housing was substantially below (less than 75% of) the housing requirement over the previous three years.” (NPPF, Footnote 8)
- 3.5 The position with regard to the Council’s housing land supply and delivery is therefore of great importance.

4. Housing land supply and Delivery

- 4.1 Paragraph 78 of the NPPF states:

“Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years’ worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old”

- 4.2 The Council’s adopted strategic policies are more than five years old, and therefore we must use the local housing need (as calculated using national Standard Methodology) to assess our five year housing requirement.
- 4.3 This position is set out in the Council’s published Five Year Housing land supply statement, which can be found here: [Five year housing land supply statement | Shropshire Council](#)
- 4.4 This shows the Council cannot currently demonstrate a five year supply of housing land against the five year housing need. This means the Council must apply paragraph 11 (d) of the NPPF to decision making. This is often referred to as the **‘tilted balance’**. For the avoidance of doubt, the Council are able to currently demonstrate sufficient housing delivery.
- 4.5 The ‘tilted balance’ is the term used to describe the shift away from the primacy of the development plan in decision making. In this situation, the Council must therefore apply appropriate weight to other material considerations, including the lack of a five year housing land supply.



- 4.6 This means that whilst it remains relevant to start a decision making process with reference to the development plan, in relation to applications for new housing development the decision taker **must** go beyond this to apply the tilted balance, and determine if there are sufficient material considerations which would outweigh any conflict with the development plan.
- 4.7 As this is the process the decision maker must follow, it is advised that Parish and Town Councils also apply this approach to commenting on planning applications in their area.
- 4.8 Shropshire Council's current position on housing land supply is replicated across many other local authorities, as is the recent uplift in housing need resulting from the government's updated Standard Methodology. The inevitable conclusion of this process will be twofold:
- 1) There is likely to be an uplift in speculative planning applications for residential development, including on sites not in conformity with the development plan; and
 - 2) That the Council is more likely to grant permission for speculative residential applications, as a result of applying the 'tilted balance' to decision making
- 4.9 However, this situation is not a carte blanche for the approval of all speculative residential proposals. For proposals to be approved they must be considered to represent 'sustainable development' in line with the NPPF and the policies of the development plan.
- 4.10 However, it is important to recognise that in the current circumstances, a decision to refuse permission to a residential proposal cannot solely rely upon there being a conflict with the development plan.
- 4.11 Conclusions on whether a site is considered 'sustainable' is a professional planning judgement having considered the 'planning balance'. Parish and town council comments will be taken into account in applying this planning judgement where they outline material considerations.
- 4.12 In applying the presumption in favour of sustainable development to decision making, paragraph 11 of the NPPF provides a useful guide to the types of issues which will be of particular importance:

"where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

- i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed; or*



- ii. *ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, **having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination***” (my emphasis)

4.13 It is therefore recommended that in making comments on planning applications, parish and town councils give consideration to the following issues as important material considerations:

- If the proposed site represents a sustainable location for new development;
- If the application provides an effective use of land?
- If the application secures a well designed place and provides affordable housing?

4.14 It is recognised these remain quite broad considerations, and there may well be other issues a parish or town council may wish to raise as a material consideration. In applying material considerations to decision making on planning applications, it is generally helpful for the Local Planning Authority to receive comments from parish and town councils regarding local knowledge and awareness. For instance, it is helpful for the LPA to consider comments about the lived experience of local people living around a development and comments on what constitutes local distinctness and character. This will help the LPA consider such issues such as the appropriate types of materials being used or the design and layout of the proposals, alongside other issues of a more general nature. It is possible to nuance comments so that, even if a parish or town council wishes to make an objection to the principle of development, comments can still be made without prejudice to all of the other material issues.

4.15 To provide further support to this position, and to help provide a continuation of a strategic approach to development, in February 2025 Shropshire Council’s Cabinet agreed the following:

*“the **evidence base** supporting the draft Local Plan (2016-2038) is a material consideration in decision making on relevant planning applications, to support the implementation of the presumption in favour of sustainable development. This will include planning applications for new development on sites proposed to be allocated in the submitted version of the Local Plan (2016-2038)”*

4.16 Whilst the draft Local Plan itself was subsequently withdrawn from the examination in July 2025, this Cabinet agreement remains valid, as it is the evidence base where weight can be applied to decision making as a material consideration, not the draft Plan itself.



- 4.17 The evidence base supporting the withdrawn Local Plan can be found here [Evidence base for withdrawn Local Plan | Shropshire Council](#).
- 4.18 In addition to the evidence base for the withdrawn Local Plan, there remains the opportunity for an applicant to raise additional material considerations in support of their planning application. This can include issues such as an elevated level of affordable housing provision or open space provision against policy compliant levels.

5. Replying to planning applications

- 5.1 A parish and town council can choose to provide comments to a planning application in support, objection, or remaining neutral.
- 5.2 If an objection is raised, in applying the above guidance we would recommend this is supported by a commentary about both the conformity of the site to the adopted development plan **and** a view on other material considerations.
- 5.3 It is relevant and entirely appropriate for a comment to seek improvements to a proposal without this being framed as an objection. Indeed, this is often helpful for the case officer to feed back to the applicant. It is however greatly encouraged that comments are made in timely manner and as soon as possible in order to allow the Council sufficient time to explore appropriate opportunities for modifications to proposals.

