Reform of Planning Committees: Technical Consultation

Overview

The Land, Planning and Development Federation (LPDF) welcomes the government's continued focus on reforming the planning system and recognises that this technical consultation on planning committees represents another step in the right direction. If the ambition to deliver 1.5 million new homes within this Parliament is to be realised, the LPDF believes that improving the speed, consistency and certainty of planning decisions is essential, and reforming how planning committees operate will play a critical role in this.

As highlighted in the LPDF's earlier response to the Working Paper on Planning Committee Reform[1] , the way in which planning committees currently function is a significant contributing factor to delays in the planning system. Research undertaken by Lichfields on behalf of the LPDF, "How Long is a Piece of String?"[2]evidences the variability and unpredictability in decision-making timeframes across Local Planning Authorities (LPAs). This inconsistency erodes confidence, inhibits investment, and ultimately stalls the delivery of much-needed homes and infrastructure.

The LPDF supports the government's intention to create a more streamlined and transparent planning system, and recognises that the introduction of a national scheme of delegation is a key lever to achieve this. However, in order for such a scheme to be successful, it must be underpinned by clarity, simplicity, and consistency. A well-designed national scheme of delegation can empower planning officers to make appropriate decisions at speed, reduce the burden on committee agendas, and provide applicants with greater certainty and efficiency.

While the LPDF supports the direction of travel and the broad intent of the proposals, we believe that a number of targeted amendments could help to optimise the effectiveness and outcomes of the reforms. These include sites which have been allocated in local plans being included in Tier A and the creation of a statutory role for Chief Planners.

About the LPDF

The LPDF seeks to represent the UK's leading land promoters, home builders and commercial developers.

LPDF members support the housebuilding and commercial development sectors by promoting sites through the planning system, providing "shovel-ready" land with a planning permission which can facilitate the delivery of infrastructure and serviced land parcels.

The LPDF seeks to actively engage with government on planning, housing and commercial development policy and to educate the wider public on the social, environmental and economic benefits of development through an evidence-based approach.

The LPDF encourages its members to deliver well-designed, high-quality, sustainable places which deliver a mix of housing types and tenures, commercial spaces and community uses that have a positive social, environmental, and economic impact.

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[1] LPDF Response to Planning Committee Reforms - January 2025.pdf

[2] Lichfields (May 2025) – How Long is a Piece of String?

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Our key values include:

- Working in a positive and cooperative way with central and local government and key stakeholders, to deliver a planning system capable of supplying the homes and employment space we need.
- Promoting research and an evidence-led approach to policy development.
- Increasing the supply of new homes to meet demand and make home ownership a realistic possibility for all those who aspire to it.
- Ensuring that we build the affordable homes of all types and tenures that this country so desperately needs.
- Delivering new employment space to meet demand from businesses and support economic growth.
- Championing the impact of increased housing delivery on reducing intergenerational unfairness.
- Creating well designed, high quality and sustainable places to live and work.
- Educating and informing about the social, environmental and economic benefits of development.
- Supporting diversity of delivery in the market and championing SME developers.
- Promoting diversity and inclusivity within the sector.

Questions

Question 1: Do you agree with the principle of having a two-tier structure for the national scheme of delegation?

Yes, the LPDF supports the principle of introducing a two-tier structure for the national scheme of delegation. We believe this approach strikes the right balance between providing a consistent national framework and allowing sufficient flexibility to reflect local democratic oversight where it is most appropriate.

A clearly defined two-tier system has the potential to bring much-needed clarity and certainty to the development management process. By establishing a standardised set of nationally prescribed categories of planning applications that must be delegated to officers (Tier A), the scheme can reduce inconsistency and delay, particularly for routine or non-contentious proposals that do not require committee involvement. This will help to ensure that planning committees are focused on genuinely strategic or sensitive applications, thereby improving overall efficiency.

We also support the proposed Tier B category that allows for limited local discretion within nationally set parameters. However, we emphasise that this flexibility must be applied consistently and transparently, with clearly defined criteria to avoid reintroducing the very inconsistencies the reforms aim to address.

This approach is also reflective of best practice already adopted by some LPAs, where existing schemes of delegation have successfully implemented a similar two-tier structure. These arrangements have demonstrated that it is possible to maintain democratic accountability while enabling more efficient processing of straightforward applications. Learning from these local examples can help inform a national model that is both robust and practical.

Whilst we support the two-tier approach in principle, we believe there is scope for refinement regarding which types of applications fall into each tier. We will highlight suggested changes and clarifications on these points in our responses to subsequent questions in this consultation response.

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One further point to note with regard to these proposals is that whatever form the new national scheme of delegation takes, this should be seen as a minimum standard. LPAs should be encouraged to build on this baseline and adopt best practices that go further where appropriate. This will help to avoid situations where LPAs that already operate more advanced or effective delegation schemes are forced to regress or scale back in order to comply with the national model.

Overall, the LPDF strongly supports the principle of a two-tier structure and sees it as a positive and proportionate step toward a more efficient and effective planning system. With targeted amendments and a continued focus on consistency, we believe this approach can deliver tangible benefits for applicants, communities and local authorities alike.

Question 2: **Do you agree the following application types should fall within Tier A? applications for planning permission for:**

- **Householder development**
- **Minor commercial development**
- **Minor residential development**
- **applications for reserved matter approvals**
- **applications for non-material amendments to planning permissions**
- **applications for the approval of conditions including Schedule 5 mineral planning conditions**
- **applications for approval of the BNG Plan**
- **applications for approval of prior approval (for permitted development rights)**
- **applications for lawful development certificates**
- **applications for a Certificate of Appropriate Alternative Development**

Yes, the LPDF agrees that the application types listed should appropriately fall within Tier A. These categories generally relate to non-strategic, lower-impact, or technical matters that are well-suited to officer-level decision-making. Delegating these types of applications to officers is a proportionate and practical step that will help streamline the planning process and free up committee time for more complex or contentious proposals.

In addition, we would strongly recommend that applications relating to allocated sites (both outline and reserved matters) also be included within Tier A. The principle of development on these sites has already undergone extensive scrutiny through the local plan process, including public consultation and examination. Given that these sites are already deemed acceptable in principle, it is neither necessary nor efficient for decisions on such applications to be routinely referred to planning committees. Delegating these applications to officers would support a plan-led system and help avoid unnecessary delay in bringing forward much-needed development.

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Question 3: **Do you think, further to the working paper on revising development thresholds, we should consider including some applications for medium residential development (10-50 dwellings) within Tier A? If so, what types of application?**

The LPDF expressed support in principle of the proposed "medium sites" category in response to the government's recent working paper[3], as a way to help boost housing delivery, support SME developers, and promote a more diverse and resilient housing market. However, we do not believe that this category should form the basis for determining whether an application falls within Tier A or Tier B under the national scheme of delegation, unless the medium-sized site is an allocation (as discussed in response to question 2 above).

In our view, site size or dwelling numbers alone are not reliable indicators of whether a planning application should be delegated to officers. A scheme of 50 dwellings may be straightforward in one area but complex and locally sensitive in another. Delegation should instead be based on whether the technical matters have already been interrogated through the local plan process, and not just numerical thresholds.

We believe the core purpose of a national delegation scheme is to embed consistent practice across LPAs, particularly the understanding that planning committees should not revisit the principle of development where that principle has already been established, whether through a local plan allocation or an outline application.

To genuinely increase housing delivery on small and medium sites, we believe the government should focus on achieving a truly plan-led system and require LPAs to allocate more of these sites through local plans. This would provide a clear policy basis for officer delegation, enabling faster decisions on well-located sites without compromising democratic oversight.

Question 4: Are there further types of application which should fall within Tier A?

Yes, the LPDF believes there are additional types of applications that should appropriately fall within Tier A due to their technical nature, limited planning judgment, or relatively low impact. These include:

- Applications for works to trees covered by Tree Preservation Orders (TPOs), which are often routine in nature and can be appropriately assessed by officers.
- Applications for the discharge of planning conditions, which are technical assessments that do not require committee oversight.
- Applications for advertisement consent, which are generally minor in nature and well-suited to officer determination.

Including these types of applications within Tier A would further streamline the decision-making process and help focus committee time on applications where elected member input adds the most value. These changes would also contribute to a more proportionate and efficient planning system.

[3] LPDF (July 2025) – Response to Reforming Site Thresholds Working Paper

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Question 5: Do you think there should be a mechanism to bring a Tier A application to committee in exceptional circumstances? If so, what would those circumstances be and how would the mechanism operate?

The LPDF supports the principle of a clear and consistent national approach to delegation and recognises the importance of Tier A being reserved for straightforward, non-contentious applications that should proceed without committee involvement. This clarity is central to achieving the efficiency and consistency objectives of the proposed national scheme of delegation. Therefore, the LPDF's view is that no mechanism should be available to bring Tier A applications to committee.

However, if the government chooses to include a mechanism, then this should be limited to very exceptional circumstances. This would need to be a carefully defined "call-in" option that does not create an automatic route to committee. Any such "call-in" test should be subject to a professional gateway test, aligned with the same principles and criteria used in Tier B, led by the Chief Planner (see our response to Question 6 below). This would ensure consistency, avoid the risk of politicisation, and maintain the integrity of delegated frameworks.

Question 6: Do you think the gateway test which requires agreement between the chief planner and the chair of the planning committee is suitable? If not, what other mechanism would you suggest?

The LPDF supports the introduction of a gateway test as a positive step toward ensuring that decisions to refer planning applications to committee are proportionate and justified. We agree that such a mechanism can play an important role in streamlining the decision-making process and focusing committee time on genuinely strategic or sensitive applications.

However, we believe the gateway test would be more effective and robust if the responsibility rested solely with the Chief Planner. This would help to preserve professional independence, reduce the potential for political pressure, and ensure that decisions are grounded in planning judgment and expertise. A clear, professionally led process would also support greater consistency in the application of the national scheme of delegation across different authorities.

We also take this opportunity to reiterate our strong support for the establishment of a statutory role for the Chief Planning Officer within each local authority. Embedding this role in legislation would formalise professional leadership within the planning system and reinforce the ability of Chief Planners to make impartial decisions in the public interest. It would also bring planning in line with other statutory functions within local government, helping to raise standards and strengthen accountability.

We consider these changes to be constructive enhancements to the proposals and fully in keeping with the overall aim of delivering a more efficient, transparent, and professionally led planning system.

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Question 7: Do you agree that the following types of application should fall within Tier B?

a) Applications for planning permission aside from:

- **Householder applications**
- **Minor commercial applications**
- **Minor residential development applications**

b) notwithstanding a), any application for planning permission where the applicant is the local authority, a councillor or officer

c) applications for s73 applications to vary conditions/s73B applications to vary permissions

Please see above, our response to question 4 which highlights some further application types that the LPDF considers should be included within Tier A.

Question 8: Are there further types of application which should fall within Tier B?

The LPDF considers that the current proposals for Tier B applications provide a clear and appropriate scope that balances the need for local discretion with the benefits of a consistent national delegation framework.

We have highlighted a potential "call-in" mechanism, under the professional discretion of the Chief Planner, in our response to Question 5 of this consultation. If the government went down this route, it would allow any application, regardless of type, to be brought to committee in exceptional circumstances. We believe this approach offers sufficient flexibility without the need to expand the categories of Tier B applications.

Question 9: Do you consider that special control applications should be included in Tier A or Tier B?

The LPDF would support the inclusion of special control applications within Tier A of the national scheme of delegation. These applications, for example tree preservation orders, listed building consent, advertisement control, are typically non-contentious, involve clearly defined policy considerations, and do not generally raise complex planning issues. As such, they are well suited to officer determination and should not require referral to planning committees.

Including these applications in Tier A aligns with the fundamental purpose of the national scheme: to improve speed, consistency, and efficiency in decision-making, while allowing committees to focus their attention on more strategic or sensitive proposals.

We would also refer to our response to Question 4, where we set out additional types of application that we believe should fall in Tier A. Special control applications would fit naturally within this framework and their inclusion in Tier A reflects established good practice already in place in many authorities. Delegating such applications will help reduce unnecessary delays and administrative burden, while maintaining appropriate oversight and ensuring planning resources are directed where they are most needed.

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Question 10: Do you think that all section 106 decisions should follow the treatment of the associated planning applications? For section 106 decisions not linked to a planning application should they be in Tier A or Tier B, or treated in some other way?

For developments on allocated sites, where the principle of development has already been established through the local plan, there is scope for these applications, including associated Section 106 matters, to be delegated to officers. This aligns with our broader support for delegating routine, non-contentious applications to improve efficiency.

In cases where Section 106 decisions are not linked to a specific planning application, we recommend that these be treated with appropriate care, reflecting the wider implications for the council and community. Overall, the approach should balance the need for efficient processing with transparency and accountability, ensuring that significant obligations affecting the council are subject to appropriate democratic scrutiny.

Question 11: Do you think that enforcement decisions should be in Tier A or Tier B, or treated in some other way?

The LPDF believes that enforcement decisions should be dealt with by way of delegation and not committee; therefore they should be in Tier A.

Question 12: Do you agree that the regulations should set a maximum for planning committees of 11 members?

Yes, the LPDF agrees that the regulations should set a maximum limit of 11 members for planning committees. This maximum strikes an appropriate balance between ensuring sufficient representation and diversity of views, while maintaining an efficient and manageable committee size.

Limiting committees to a maximum of 11 members helps to facilitate more focused and effective discussions, streamline decision-making processes, and reduce administrative burdens.

Question 13: If you do not agree, what if any alternative size restrictions should be placed on committees?

The LPDF have no comments to make in response to this question.

Question 14: **Do you think the regulations should additionally set a minimum size requirement?**

The LPDF have no comments to make in response to this question.

Question 15: Do you agree that certification of planning committee members, and of other relevant decisions makers, should be administered at a national level?

The LPDF agrees and strongly supports the need for mandatory training for planning committee members. This training should be a certified course, which can be delivered both in-house by local authorities and by external providers. It is important that the training is substantive, undertaken regularly, and accredited to ensure all councillors meet a minimum level of understanding necessary to make informed planning decisions.

However, while supporting certification, the LPDF is cautious about administering this entirely at a national level, focused solely on national content. The planning system contains local nuances and varying contexts, so there is real benefit in allowing local delivery of training tailored to address specific regional or authority-level issues.

A national framework could provide a high-level core curriculum, potentially delivered through accessible online platforms, but detailed or technical topics such as considerations around five-year land supply should be adapted

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locally to ensure practical relevance. We also caution against creating an overly bureaucratic or costly certification industry. The national framework should avoid unnecessary expense and complexity, ensuring it remains practical and cost-effective for local authorities and committee members.

In summary, the LPDF supports mandatory, accredited training that is regularly renewed, combining nationally consistent standards with local delivery and flexibility to ensure effectiveness and efficiency.

Question 16: Do you think we should consider reviewing the thresholds for quality of decision making in the performance regime to ensure the highest standards of decision making are maintained?

The LPDF agrees that maintaining high-quality decision-making must remain at the forefront of any performance regime. Ensuring robust, transparent, and well-reasoned planning decisions is essential to maintaining public confidence and delivering sustainable development outcomes.

At the same time, it is crucial that this focus on quality does not come at the expense of efficiency. The planning system should continue to be simplified and streamlined to speed up decision-making processes, reducing unnecessary delays for applicants and local authorities.

We therefore support considering a review of thresholds for quality of decision-making, but this must be done with careful attention to striking the right balance between upholding the highest standards and enabling a more efficient, responsive system. The ultimate goal should be a planning system that encourages excellent decision-making while facilitating timely, proportionate outcomes that serve both communities and delivery objectives.

Question 17: For quality of decision making the current threshold is 10% for major and non-major applications. We are proposing that in the future the threshold could be lowered to 5% for both. Do you agree?

Please see our response to Question 16.

Question 18: Do you have any views on the implications of the proposals in this consultation for you, or the group or business you represent, and on anyone with a relevant protected characteristic? If so, please explain who, which groups, including those with protected characteristics, or which businesses may be impacted and how.

The LPDF have no comments to make in response to this question.

Question 19: Is there anything that could be done to mitigate any impact identified?

The LPDF have no comments to make in response to this question.

Question 20: Do you have any views on the implications of these proposals for the considerations of the 5 environmental principles identified in the Environment Act 2021?

The LPDF have no comments to make in response to this question.

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