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July 2025

## Reform of planning committees: Technical consultation

### Consultation response from The Housing Forum

#### **Response submitted by:**

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#### **About The Housing Forum**

The Housing Forum is the UK's cross-sector, industry-wide organisation that represents the entire housing supply chain. Our growing membership drawn from over 150 organisations across the public and private sectors and includes local authorities, housing associations, housebuilders, architects and manufacturers. All share our determination to drive quality in the design, construction and decarbonisation of UK homes. They have a commitment to partnership working and share in our vision of 'A Quality Home for All'.

In order to achieve this, we have advocate for policy change needed for everyone to live in a good quality, sustainable and affordable home. Our key [Housing Solutions](#) set out how we think this can be achieved.

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## Introduction

The Housing Forum's cross sector membership means that we are uniquely placed to bring together those who work within local authority planning departments (officers, and also local councillors), with those who put in planning applications – housebuilders, housing associations and architects.

During 2023, we ran a working group on planning which produced two reports on planning ([Streamlining-planning](#) and [Planning validation requirements](#)). More recently, we have brought our members together to discuss the government's proposals for planning reform, including the proposals around reform of planning committees, and [responded to the working paper on planning committees](#) published late last year.

Housing Forum members from across the sector appreciate the rationale behind the proposed reforms – all agree that planning can become politicised in a way that does not serve the greater good, and that councillors can have pressure put upon them by local residents to block applications for reasons that are not, on balance, in the best interests of current and future populations.

Reducing the number of applications that go to committee would also have a beneficial impact on the resourcing demands placed on local planning departments, and could help improve the job-satisfaction and staff retention of professional planners, as they are being trusted to make more decisions.

We previously expressed some concerns around suggestions of using compliance with development plans and local policies as a factor for determining which applications go to committee, when this is rarely black and white. We are pleased to see that the Government has listened to these concerns and proposed criteria which look to be much more practical, as well as balancing the need for democratic oversight with the need for efficiency and professionalism in decision making.

We see strong and widespread support for compulsory training of councillors sitting on planning committees.

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## Response to questions

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

Yes

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

- applications for planning permission for: householder development
- applications for planning permission for minor commercial development
- applications for planning permission for minor residential development

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- 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

We agree with the proposed list of Tier A applications, with the possible exception of reserved matters applications on major applications where there has been only an outline application.

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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?**

We would be supportive of stand-alone applications for medium sized development also being included in Tier A. Simplifying and speeding up the planning process for SME builders should help housing to be built faster, and there is a need to raise the threshold higher than 10 homes for this to be most effective. It should also help reduce the workload on planning staff, for whom taking an application to committee requires additional workload.

There may be a case for medium sized applications that form part of a wider development being Tier B, so that committees can consider their wider cumulative impact on occasion. However, developers inform us that they would be unlikely to put in multiple small applications in order to avoid committees, because this would cost them more money and resources.

It may also be sensible to allow local authorities to pre-identify key sites that are of key importance, such as a really important gateway location, where medium sized applications would be assessed as Tier 2 with the option to go to committee if required.

There may also be a case for allowing medium sized applications in rural areas to go to committee, as the large majority of new homes are likely to be delivered via small or medium sized sites in these areas, and 50 homes will have more impact on a local areas in a small village than it does in a wider city.

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

The following types of application would normally be delegated to officers anyway, so should be included in Tier A:

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- Applications for things that would normally be permitted development but where Article 4 has been used to require permission, such as conversions to HMOs.
- Listed building applications
- Conservation area consents
- Advertising consents
- Tree preservation orders.

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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?**

This would not be helpful, overall as it would seem to defeat the purpose of the legislation, and of having two Tiers, where Tier A is intended to be those that are always appropriate for delegated decision making. There may be a case for allowing exceptions in limited circumstances with the agreement of the applicant.

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**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?**

We are supportive of this approach in principle, though have some concerns about political pressure being put upon Chief Planning Officers, in situations where there is not a strong and positive relationship between them and the Chair of the Planning Committee. To help mitigate this risk, we would support the [RTPI's call](#) for the Chief Planning Officer to be a statutory role, which would elevate their professional status (as well as ensuring that the person with the power to make decisions over Gateway 2 is clearly identified).

We have some concerns that the first of the two criteria set out in Paragraph 26 for triaging applications under Tier 2 (“the application gives rise to an economic, social or environmental issue of significance to the local area”) is quite subjective and could undermine the effectiveness of Tier 2.

The inclusion of what would otherwise be Tier A applications in Tier B if the applicant is a local authority officer or councillor could do with tighter definitions. Local authority officers should be restricted to those who work within the local authority planning department or at a senior level elsewhere in the authority. Junior staff in other sections of the council are unlikely to have any more influence over planning officers than other people who live in the local authority.

The Housing Forum would like to see clear guidance provided to local authorities around the Gateway Test and the **process** of determining whether a Tier 2 application should go to committee. We would recommend that it avoids putting additional workload on local authorities by initiating the Gateway Test only if either the Chief Planning Officer or Chair of Committee chooses to consider that an application should go to committee, so it then becomes a test of whether this is appropriate (rather than something that all potential Tier 2 applications must be assessed under).

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There is also a need for clear timelines - Allowing councillors to call-in applications at a late stage is unhelpful and results in unnecessary delays.

**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**

Yes

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

No. Attempting to define applications that are of significant economic, social or environmental significance would add an unnecessary additional complexity to the planning system. Local authorities already have discretion to delegate decision making to officers for other types of cases if they choose, any most have well-developed policies for doing so that work in their area.

**Question 9: Do you consider that special control applications should be included in:**

- **Tier A or**
- **Tier B?**

Tier A

**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?**

S106 decisions linked to planning applications should follow the treatment of the associated planning application.

It is relatively uncommon for S106 agreements not to be linked to a specific application, but does occur, for instance when land is designated for biodiversity net gain offsetting, without a change of use occurring. We would suggest that:

- BNG offsetting is Tier A
- All other S106 agreements not linked to a specific application are Tier B, as there may be a variety of unusual circumstances in these, so individual

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judgement may be necessary. This would not be common, so will not create much additional workload.

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

Tier B would probably be most appropriate here – most enforcement decisions are routine, but occasionally there may be a significant decision to enforce or not to enforce, which as committee has a reason to oversee.

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

Yes, though note issues below

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

Some larger authorities already operate more than one planning committee, which run in parallel to ensure the workload is manageable on individual councillors – though the requirement for this may reduce in future as the regulations should reduce the number of applications that are heard at committee. Rules around the size of committees should make it clear whether having two committees is permissible or not. Regulations should also permit online meetings of planning committees.

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

Yes. A minimum size requirement of six would be appropriate, though guidance should recommend that some authorities may want to set a larger minimum size requirement that reflects the scale of development in their area.

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

Yes, this is the national part that should be certified, though local authorities should be required to provide locally-specific training for committee members alongside this.

We see widespread support for mandatory training of councillors from all parts of the housing sector, including local councillors themselves and officers working in local authorities. Planning is complex, and has become more so in recent years, and if councillors do not fully understand it this slows things down and results in poor-decision making. Decisions are too often overruled at appeal – costing both councils and planning applicants (which can include housing associations and other not for profits) a lot of money, and lost time (which also means additional costs, because of the interest on money borrowed to buy sites and apply for planning permission).

There are two aspects to training that should be included:

- The technical aspects of planning. This should include the appeals process and reasons why a councillor might want to approve something that they don't like, because refusing it will likely result in a lost appeal.

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- How to make decisions that balance different priorities, place-making and urban design.

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Planning committees have a dual role – representing the will of the residents, and ensuring that applications come forward in line with the local plan, and are built to achieve the local authority’s wider objectives around growth and prosperity.

Councillors need to be trained in how to explain a positive reason for building new homes – saying that there isn’t a legitimate planning reason to oppose them is insufficient. Councillors find it easier to justify social housing – because allocation schemes will ensure that it is allocated to local residents, and find it harder to explain to local people why market housing is necessary in their area, because it will not necessarily be bought by people already living there.

Councillors should be encouraged to sit in on committees before they have completed their training, so that they can understand how the committee works in practice. It is also important to ensure that planning does not grind to a halt following a local election in which a large number of new councillors are elected onto the planning committee. Government should clarify how often committee members have to update their national training and provide guidance on updating local training.

**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?**

Yes

**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?**

No. We support the Government’s ambition to drive up standards in planning, and to discourage councils from refusing permission knowing that this is likely to be overturned at appeal. (This can happen as a way of avoiding taking the political blame for housing that is locally unpopular, but in line with policy). However, reducing the threshold right down to 5% from 10% is a big jump, and coming at a time when housing targets have risen in many areas, which may be increasing local opposition to housebuilding. A target of 7 or 8% may be more appropriate.

**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 proposals outlined here should have the effect of increasing the delivery of new homes. This would benefit many groups with a protected characteristic who are currently more likely to be disadvantaged in the housing market, including young people, disabled people, women and most BME groups.

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

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As the impact we have identified is a positive one – reducing inequalities on disadvantaged groups - mitigation does not seem appropriate!

**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?**

No

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