

**Ministry of Housing, Communities and Local Government**

**Planning Reform Working Paper: Planning Committees**

**Response from Propertymark**

**February 2025**

**Background**

1. Propertymark is the UK's leading professional body of property agents, with over 18,000 members representing over 12,500 branches. We are member-led with a Board which is made up of practicing agents and we work closely with our members to set professional standards through regulation, accredited and recognised qualifications, an industry-leading training programme and mandatory Continuing Professional Development.

**Consultation – summary**

2. The Ministry of Housing, Communities and Local Government (MHCLG) has launched an informal consultation which builds on its wider proposals for planning reform. The focus of the consultation is looking at options for change to planning committees within local authorities in England in three particular areas, all of which would require changes to primary legislation through the Planning and Infrastructure Bill. The areas of focus are:

- the introduction of a national scheme of delegation
- a new system of targeted committees for strategic development
- mandatory training for committee members

3. A national scheme of delegation will give power to the Secretary of State to introduce a national standard determining when decisions are taken by the planning committee rather than delegated to officers. Thus, setting a standardised and consistent approach to delegation across the country. The UK Government is proposing a choice between three potential options for standardised delegation.

4. The first option would only require delegation where the planning application complies with the existing development plan. The second option would require all applications to be delegated except where there is a departure from the development plan and it is recommended by officers for approval or the application has been submitted by the local planning authority, its members or

officers. The third option also requires all application to be delegated except for those which fall within a specific, predetermined list of application types.

5. Targeted committees for strategic development are intended to focus on key developments identified in local plans, which will bring long term change to the local area. These include individual large scale development proposals, as well as Area Action Plans and proposals for urban extensions. It is proposed that this would not be subject to the national scheme of delegation as these decisions would always be determined by elected members in a planning committee. The UK Government is proposing a requirement for local authorities to establish smaller, dedicated committees focused only on strategic development. These committees would work in addition to and alongside main planning committees.
6. Finally, mandatory training for all planning committee members is intended to ensure that members are sufficiently trained in planning matters before they are able to make decisions. The UK Government believes that there are too many decisions made where planning justification is weak and overturned at appeal, causing unnecessary delays and uncertainty. There is an inconsistent approach to training across the country, so the government is proposing to introduce mandatory training for all planning committees, and for key decision makers to undertake certified training, before they can sit on a planning committee.

#### **Propertymark response**

7. Propertymark welcomes the opportunity to respond to MHCLG's proposals on Planning Committees. The supply of homes is a key area of concern for our members, as the undersupply of housing has contributed to rising rents and the unaffordability of housing for many. Our positions are based on the underlying need to maximise the number of homes built but ensuring new homes are built in places that people want to live in.
8. Overall, there are some positive elements to the proposals. For example, establishing clear rules on when applications should be decided by planning officers is a positive step to ensuring consistency and greater confidence from developers. Additionally, establishing greater capacity from councillors to oversee strategic development will likely improve the pace in which planning applications will be approved. However, we are concerned that the proposals could potentially increase the workload for planning officers, at a time where local authorities are struggling to

retain planning officers<sup>1</sup>. Additionally, basing the decision to delegate to planning officers on the Local Plan does not account for the potential change of priorities for the local authority, which local councillors would be better placed to address. Overall, our position is based on the following four points:

- **Address the undersupply of planning officers** – under these proposals, it is likely that a greater number of planning applications will be delegated to planning officers. This is at a time when the UK Government’s own figures have identified that in the last 12 months, nine out of 10 planning departments reported some difficulty with recruitment (91%) and seven in 10 (72%) reported some difficulty with retaining staff<sup>2</sup>. Before greater responsibility is placed on planning officers, we need a national recruitment and upskilling campaign to ensure local authorities have the skills they need to cope with the increase in planning applications.
- **The national delegation scheme does not account for local authorities which do not have a Local Plan** – before a national delegation scheme is based on planning applications’ adherence to a Local Plan, more local authorities must have produced there’s. In the meantime, we would recommend a national delegation scheme that focuses on whether a planning committee or planning officers will be quicker at reviewing applications.
- **The planning system must account for changing priorities for local authorities** – while Local Plans can help set expectations for planning applications, helping to provide confidence that applications will be accepted, the planning system needs to be flexible for local authorities to adopt new priorities when necessary. As such, the national delegation scheme’s compliance with the Local Plan could be detrimental to some communities.
- **Many of the positives of a national delegation scheme can be achieved by mandating that local authorities develop their own delegation scheme** – if local authorities are able to establish their own delegation scheme, they can base delegation on the current capacity of their planning committee and planning officers to review planning applications. While a national scheme will provide consistency, enforcing that local authorities need to make it clear what their delegation scheme is can help provide the clarity that developers need.

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<sup>1</sup> [Local Authority Planning Capacity and Skills Survey 2023 - Survey report](#)

<sup>2</sup> [Local Authority Planning Capacity and Skills Survey 2023 - Survey report](#)

Questions

**Question 1: Do you think this package of reforms would help to improve decision making by planning committees?**

9. Ultimately, we do not believe that the reforms in their current state would improve decision making by planning committees. While we agree with the benefits of training and targeted committees for strategic development, there are three main issues with the current national delegation strategy:

- Firstly, the national scheme of delegation assumes that delegation should take place in the majority of circumstances, which will not work for every single local authority. Our concern is that, given the aforementioned skills gaps and hiring issues affecting local authorities, planning officers will not have the capacity across all local authorities to meet the increased workload. If the goal is to increase the speed in which planning decisions are made, decisions need to be made based on the capacity of the Planning Committee and planning officers they delegate to, which a national scheme would not allow. The ability for local authorities to delegate based on their own parameters will allow them to delegate based on their own operating needs, allowing for more optimal planning procedures within each local authority.
- Secondly, delegation based on application's compliance with a Local Plan fails to account for the changing needs of local communities and nuances in planning applications. Delegation by default could lead to some developments, which do not have public support, being approved despite having a negative impact on a local area. As stated earlier, delegation should be based on the ability to approve developments quickly when they would provide good homes that people would like to live in.
- Thirdly, given the current supply issues within planning departments, local authorities will need to hire planning officers from further outside the local authority. This reduces the local expertise and understanding of nuanced local issues within planning departments, leading to poorer decision making. However, under current proposals, there is little recourse for local authorities if planning officers are unable to make effective, timely decisions as delegation would take place by default.

10. Our views on the specific options in regard to national schemes of delegation are laid out in our response to question 2.

**Question 2: Do you have views on which of the options we have set out in regard to national schemes of delegation would be most effective? Are there any aspects which could be improved?**

11. We disagree that any of the options would be effective. As stated in our response to question 1, delegation by default should be avoided unless local authorities believe that would be beneficial to them. If one out of the three options had to be suggested, we would urge MHCLG to consider option 3. However, we would caveat that with any “delegation as default” should be avoided. Instead, we would encourage local authorities to set clear criteria as to when delegation should be considered.

12. In addition, we acknowledge that the purpose of the national delegation scheme is to help provide greater clarity and consistency for development proposals. While there is a case to be made that larger development companies may benefit from this, this would have little impact on smaller developers who only operate across a small number of local authorities. When we also account for the issues raised earlier in our response, we fear that the potential benefits will be minimal compared to the challenges presented by enforcing a national scheme of delegation. As an alternative, that would provide clarity while enabling local authorities to delegate based on their own working practices and priorities, we would recommend that the UK Government mandate that local authorities create and publish their own delegation criteria. That way, criteria can be designed at a local authority level while being easily accessible to developers.

**Question 3: We could take a hybrid approach to any of the options listed. Do you think, for instance, we should introduce a size threshold for applications to go to committees, or delegate all reserved matters applications?**

13. We disagree that there should be a fixed size threshold for applications to go to committees. Any delegation that goes to committees or planning officers should be decided by local authorities. That way, decisions can be made based on the current circumstances of local authorities. This would avoid situations where planning officers are overstretched if they are facing staffing shortages and enable planning committees to make decisions when potentially locally sensitive

planning applications are made but would go to planning officers under the national delegation scheme.

**Question 4: Are there advantages in giving further consideration to a model based on objections?**

14. We do not think there are advantages in giving further consideration to a model based on objections. We outright reject a national model but would recommend requiring local authorities to support developers by sharing their own model of delegation which would be regularly reviewed.

**Question 5: Do you agree that targeted planning committees for strategic development could facilitate better decision making?**

15. We agree that targeted planning committees for strategic development could facilitate better decision making. Having additional committees for larger scale projects, with councillors dedicating themselves to a small number of projects over a long period of time can help ensure a greater understanding of the project and its implications from the local authority. This would enable them to make decisions based on what works well for them and what can lead to quicker planning decisions.

**Question 6: Do you have a view on the size of these targeted committees?**

16. Propertymark thinks that the size of committees should be at the discretion of local authorities, as they are the best placed to decide the membership of committees in their local area. These could differ from area to area and would depend on the number of councillors who are able to attend, have had adequate training and who represent a balanced political make up.

**Question 7: How should we define strategic developments?**

17. Ultimately, the definition of strategic developments should be defined by local authorities. We would welcome guidance to ensure some level of consistency from local authorities, but any strict criteria would prevent local authorities from making decisions that best works for their own planning arrangements.

**Question 8: Do you think the approach to mandatory training is the right one?**

18. Yes, Propertymark broadly agrees with the requirement for training in planning policy and this is already compulsory for some local authorities. We recognise that planning is a particularly complex area and requires knowledge of a wide range of regulation and legislation. Planning committees should be able to make timely and informed decisions, which relate to their local plan and benefit the local area, Propertymark agrees that holding back decisions due to a lack of understanding from members can be detrimental to developers and local growth. Furthermore, a professional code of conduct or code of practice would be beneficial to those sitting on planning committees to ensure that they are adhering to the same principles and standards. Local planning can be emotive and divisive which could cause committees to lose track of the ultimate goal of building more homes for those who need them in the local area.