

Reform of Planning Committees

Technical Consultation Response

Introduction

Historic England is the government's statutory adviser on all matters relating to the historic environment in England including the marine planning area. We are a non-departmental public body established under the National Heritage Act 1983 and sponsored by the Department for Culture, Media and Sport (DCMS). We champion and protect England's historic places, providing expert advice to local planning authorities, developers, owners and communities to help ensure our historic environment is properly understood, enjoyed and cared for. We welcome the opportunity to respond to this technical consultation on reform of planning committees.¹ We have restricted our responses to those questions on which we have a view given potential implications for the historic environment.

Questions

Application Tiers

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? 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?

Yes. Overall, the tiered approach is reasonable and practical. However, decisions on the historic environment are based on impact on heritage significance rather than the scale of development, around which the tiers are structured. Minor or technical development can nonetheless have a high level of impact on a heritage asset and/ or the contribution of its setting. As such, it would be appropriate to maintain an option to send tier A applications to committee and provide guidance around when to bring Tier B applications through the gateway test. Given the committees' democratic nature, this might be driven by strong public sentiment and representations on legitimate heritage matters, especially when aligned with local priorities such as community assets, local landmarks, or strategic regeneration initiatives.

'Special Control' applications

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

Listed building consents linked to planning applications should follow the relevant application tier. Standalone listed building consents, usually minor or technical, can be included in Tier A provided there is a sufficient mechanism to send to committee, when necessary, as suggested in our response to question 5. This also applies to processes such as relevant demolition in conservation areas and certificates of lawfulness for proposed works to listed buildings.

¹ [MHCLG \(2025\) Reform of Planning Committees Technical Consultation](#)

S.106 Agreements and Enforcement

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?

Section 106 agreements are often, though not exclusively, associated with more complex development, and used, for example, for securing appropriate development phasing for enabling development schemes which secure the long-term future of a heritage asset. The nature of the proposed tiered system is that these are more likely to trigger committee consideration. As such, applications which are likely to need section 106 agreements would be best placed in Tier B so there can be scrutiny by committee where appropriate.

Member training

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. We agree that certification and oversight of member training should be managed by MHCLG at a national level. This would be more straightforward and ensure greater consistency. As outlined in the technical consultation, we also support the proposed inclusion of local issues in the training offer to members. This could take a hybrid approach where local modules are certified at a local level.

As raised in working paper response, we would re-emphasise that given the statutory duties of decision makers around the historic environment, training should include heritage matters.² Historic England already provides training to a range of stakeholders, including members and planners, and is the recognised expert organisation and statutory consultee in this area. It is important that we can deliver the member training where it relates to matters that fall within our statutory remit or to certify this if provided by third parties to support MHCLG in delivery.

Conclusion

The tiered approach appears reasonable overall. It is important to note, however, decisions on the historic environment relate to the impact on heritage significance and not to the scale of development. Therefore, a 'safety valve' is necessary, allowing tier A applications to be sent to committee in certain instances, as well as guidance for the tier B gateway test. This could be based on legitimate heritage-related representations considering community priorities. This would provide opportunities to have democratic oversight of those cases where necessary.

Antony Lowe

Senior Policy Adviser (National Planning)

Historic England, Policy and Evidence

2nd July 2025

² [Historic England \(2025\) Response to the Planning Committees Reform Working Paper](#)