

PLANNING CODE OF CONDUCT FOR COUNCILLORS

**ADOPTED BY COUNCIL, 20 OCTOBER
2015 (updated [1] 2023)**

1. INTRODUCTION

- 1.1 The purpose of the Planning Code of Conduct (**Code**) is to provide clear guidance to all Councillors who deal with planning matters at Reading Borough Council (**Council**).
- 1.2 The Council recognises that planning decisions must be made in a fair, impartial, open and consistent manner and the Code is designed to assist Councillors with maintaining high standards of conduct. This Code is both complementary and additional to the Councillors' Code of Conduct.
- 1.3 Councillors should read this Code thoroughly and apply themselves to it consistently. If Councillors have any doubts about the application of this Code they should seek early advice, preferably well in advance of any meeting from the Council's Monitoring Officer.
- 1.4 Councillors should first adhere to the Councillors' Code of Conduct and thereafter apply this Code together when involved in the planning process. If Councillors do not abide by this Code they may put the Council at risk of proceedings on the legality or maladministration of the related decision.

2. OUTLINE OF PLANNING

- 2.1 One of the key purposes of the planning system is to control development in the public interest. Planning law requires that planning applications are determined in accordance with the relevant development plan unless "material considerations" indicate otherwise. What constitutes a "material consideration" is very wide in scope but, in general, the courts focus on the "public interest" element and therefore the protection of purely private interests, such as the impact of a development on the value of private property, is not considered to be a material consideration.
- 2.2 As planning decisions affect the daily lives of the public and of private individuals (developers), they are often highly contentious. Accordingly, the decision-making process needs to be fair, impartial, open and consistent in order to avoid criticism. The parties involved in the decision-making process, namely Councillors and Officers, need to work together but with their differing roles clearly defined to help demonstrate impartiality as well as the other values required of the planning system.

3. GENERAL ROLE OF OFFICERS AND COUNCILLORS

- 3.1 Officers and Councillors have different but complementary roles within the planning system. Ultimately, their aim is to serve the public interest and therefore effective communication between both parties is imperative for delivering a good planning service.

General Role of Officers

- 3.2 The duty of Officers is to the Council as a whole. Officers are employed by and work for the Council and planning Officers carry out tasks such as preparing the development plan, assessing planning applications (in light of the development plan and any material considerations) and making recommendations to Councillors as regards such planning applications. Officers are governed by the Officers' Code of Conduct contained at Part 5 of the Constitution.

General Role of Councillors

- 3.3 The duty of Councillors is to the borough as a whole. Councillors have to balance their role of listening to the views of their ward residents, with making planning decisions against a local and national policy framework designed to promote the wider public interest. It is acknowledged that Councillors have a special duty to their ward constituents but their overriding duty is to the whole community. It is therefore very important for Councillors' decisions to be open and transparent and Councillors must not, or appear to, favour any person, company, group or area, otherwise there is a risk of complaints for maladministration or calls for judicial review of a council's decision.
- 3.4 A Councillor is not under any obligation to represent a resident on a specific planning application if, in the opinion of the Councillor, there are no issues which have a wider significance for the area, ward or administrative area as a whole.
- 3.5 Councillors are bound by the Councillors' Code of Conduct contained in Part 5 of the Constitution. Breaches of the Councillors' Code of Conduct or this Planning Code can result in a Councillor being reported to the Monitoring Officer of the Council and/or the Council's Standards Committee.

4. **REGISTRATION AND DISCLOSURE OF INTERESTS**

- 4.1 The Localism Act 2011 and the Councillors' Code of Conduct place requirements on Councillors about the registration and declaration of their interests and the consequences of having such interests. This is of particular importance when Councillors are involved in the planning application/determination process in order to avoid accusations of bias and pre-determination. It is important for Councillors to ensure that registration and disclosure requirements are followed strictly and Councillors should review their interests regularly. Ultimate responsibility for declaring an interest rests individually with each councillor.

5. **COUNCILLORS PRE-DETERMINATION, PRE-DISPOSITION AND BIAS**

Pre-determination

- 5.1 Councillors need to avoid being deemed to have "pre-determined" views when making planning decisions. It is important for Councillors to remain measured in any correspondence held with anyone involved in a planning application. Councillors should avoid expressing extreme views and ensure that there is no doubt that they will be entering a decision making process with an "open mind". For example, a clear indication by a Councillor of their intention to vote in a particular way before a meeting occurs illustrates that that Councillor's mind is already made up before hearing all of the relevant evidence; that the Councillor has a "closed mind".

Bias

- 5.2 Bias can also arise from a Councillor's relationship or interests as well as their state of mind. There is clear guidance in the Councillor's Code of Conduct on declaration of interests and acceptance of gifts and hospitality. If such guidance is followed then most forms of bias will be identified. However, Councillors also need to be alive to the risk of apparent bias which can arise from non-pecuniary or personal/conflicts of interest. The legal test for apparent bias is:

"whether the fair-minded and informed observer, having considered the facts, would conclude that there was a real possibility that the decision maker was biased".

Councillors who feel they may have an interest but are not sure whether it precludes them

from being involved in determining the planning application should seek early advice from the Council's Monitoring Officer before removing themselves from the process.

Pre-disposition

- 5.3 Pre-disposition is where a Councillor may have an existing or strong opinion about a planning matter but they keep their mind open to the information presented to them at the relevant meetings. The key issue is that the Councillor ensures that their pre-disposition does not prevent them from consideration of all the other factors that are relevant to a decision, such as committee reports, supporting documents and the views of objectors and they have an "open mind". Where expressions/opinions are provided by a Councillor, it should be made clear that they may change their view once all of the information is presented to them.
- 5.4 Section 25 of the Localism Act 2011 confirms that this position by providing that a decision will not be unlawful because of an allegation of bias or predetermination "just because" a Councillor has done anything that would indicate what view they may take in relation to a matter relevant to a decision. However if a Councillor has done something more than indicate a view on a decision, this may be unlawful bias or predetermination so it is important that early advice is sought from the Council's Monitoring Officer where this may be the case.

6. LOBBYING OF AND BY COUNCILLORS

Expressing Opinions and Conduct at Committee

- 6.1 Part of the role of a Councillor involves listening to the views of their electorate in respect of planning decisions. The lobbying of Councillors is therefore a normal part of a Councillor's role, e.g. an aggrieved member of the public voicing their concerns to a Councillor about a proposed planning application .
- 6.2 The rules of natural justice mean that planning applications should be determined in an open and fair manner and taking account of relevant information and arguments.
- 6.3 It is in this context that a Councillor must be careful not to be perceived as having pre-determined its views in relation to a planning matter.
- 6.4 It should be noted that:
- planning decisions must not be made on a party political basis and the use of political whips to try and secure a particular planning decision is likely to be deemed maladministration;
 - planning Councillors should try and avoid organising support for or against a particular planning decision and avoid lobbying other Councillors;
 - Councillors should not pressure Officers into making a particular recommendation or decision or do anything to compromise/likely to compromise the Officers ' impartiality.
- 6.5 Councillors should feel free to engage in free and frank discussion about all aspects of planning applications in advance of their determination. It is often the case that Councillors will have a strong view on a proposed application and may be open about this view in the public domain however this in itself would not preclude a Councillor from participating in the decision making process as a member of the Council's Planning Committee. However, care does need to be taken to ensure probity in the decision making process and therefore members of the Planning Committee are advised to:
- if lobbied, explain that whilst they are able to listen to the points raised they cannot indicate how they will vote prior to hearing that item at Planning Committee and before

- they have been afforded the opportunity to consider all information before them;
- ensure that if they participant in any discussions in respect of a planning application it is made clear from the outset that such discussions are not binding, are the opinion of the Councillor only and that they will only be able to reach a final decision on the merits of the planning applications after consideration of all relevant information and arguments presented to the Planning Committee;
- consider whether they should be open and transparent at a Planning Committee meeting about any conversations/contact held with applicants/developers in respect of a planning application falling to be determined at that Committee;
- advise the Democratic Services team/Planning Department of any correspondence received with the intention of lobbying the Councillor in relation to a planning application so that any objections/issues raised can be addressed by officers (where possible) ahead of a determination/Planning Committee meeting;
- make themselves familiar with any handling arrangements that have been introduced in respect of a planning application and adhere to their requirements;
- be responsive to their constituents about planning related matters as they are often very important/emotive for residents and discussions with Councillors are permitted even if they are on Planning Committee. The key consideration for a Councillor who will be involved in the determination of the planning application is to ensure that they are seen to be open minded until they have been afforded the opportunity to consider all of the relevant information.

Gifts and Hospitality

- 6.6 Councillors should be wary about accepting gifts and hospitality, especially from lobbyists or repeatedly from the same organisation. Receipt of gifts/hospitality of £25 or more should be disclosed to the Council's Monitoring Officer in writing in accordance with the Councillor's Code of Conduct.

Call-in procedures

- 6.7 Councillors have the power to "call-in" to Committee a planning proposal which would ordinarily be determined by a senior officer under delegated authority. Should Councillors exercise such power, the call-in should be in writing and set out the rationale for the call-in which must include reference to policies in the development plan and any other material planning considerations.

7. PRE-APPLICATION AND PRE-DECISION DISCUSSIONS

- 7.1 Early engagement between Officers and Councillors and developers can be very useful, particularly for more complex planning proposals, as such discussions can identify and resolve issues early on, avoiding them being addressed for the first time at the Committee meeting. However, there are risks that such discussions are viewed by objectors as part of a lobbying process by applicants or that applicants consider Councillors to have pre-determined their position prior to submission of a planning application or the making of a planning decision.

- 7.2 To avoid these issues, the following guidelines should be followed:

- Councillors should always have an officer present at any pre-application or pre-decision meeting with a developer, and a written record of the meeting should be taken (this should note the issues raised and the advice given). In addition, written records of any related telephone conversations and emails should be kept on file. If there is a legitimate reason for confidentiality regarding a proposal, a note of the non-confidential

issues raised or advice given can still normally be placed on the file to reassure others not party to the discussion;

- the advice provided by Officers should be consistent and premised on the development plan and any material considerations. Councillors should avoid giving separate advice on these items as this is the role of the Officers whose knowledge will be most-up-to-date in this respect;
- any negotiations should be carried out by Officers, updating the Councillors as necessary, to clearly demonstrate the differing roles;
- if a Councillor is invited and decides to attend a public meeting arranged by residents or interested groups about a particular planning application, the principles outlined above will apply;
- it is not unusual for planning officers to decline to attend public meetings arranged by residents or interested groups on particular planning applications unless both the applicant and objectors are properly represented or at least afforded the opportunity to attend.

7.3 Similar arrangements can also be used when the Council is looking at new policy documents and particularly when making new site allocations in emerging development plans and wish to engage with different parties, including Councillors, at an early stage in the process.

7.4 For large and complex schemes the Council may arrange appropriate presentations to Councillors by the applicant. This is seen to be beneficial to inform Councillors at an early stage and to encourage pre-application discussion and free flow of information on what are often complex or controversial issues. The Council itself will also organise presentations to keep Councillors informed generally on matters which to have or are likely to have a strategic importance to the Borough. At any such presentations/briefings Councillors should abide by the guidance in this Code, listening to presentations, raising concerns and questions, debating issues but not closing their mind or fixing on a final position in advance of a full debate at Planning Committee.

7.5 The Statement of Community Involvement will set out the Council's approach to involving communities and other consultees in pre-application discussions. Some authorities have public planning forums to explore major pre-application proposals with the developer outlining their ideas and invited speakers to represent differing interests and consultees. As well as being transparent, these forums allow Councillors and consultees to seek information and identify important issues for the proposal to address, although still bearing in mind the need to avoid pre-determination.

8. **SITE VISITS**

8.1 In addition to pre-application and pre-decision discussions, site visits can assist Councillors with gaining a better understanding of the planning proposals and therefore Councillors are encouraged to make their own visits to a site without officers or interested parties to get the "lie of the land". If another party is present then Councillors should be mindful of the advice on lobbying earlier in this document.

8.2 To lessen the risk, site visits should take place in accordance with the protocol at Appendix []:

- only be used where the expected benefit is substantial;
- have a clear purpose and format which is adhered to throughout the visit;
- involve a record being kept of the rationale for the site visit;

- be made by Councillors with officer accompaniment or alone but should not be used as a lobbying opportunity by supporters or objectors. If supporters or objectors do attend, an officer should also be present and the supporters or objectors will have no right to speak but will merely observe the process and answer questions when asked;
- be notified to the applicant.

9. THE DECISION MAKING PROCESS

9.1 In determining planning applications the Council must follow the guidelines adopted as part of this Code (Guidelines). The Guidelines will be amended from time to time to reflect the latest government guidance and law and are appended to this Code as **Appendix []**.

Procedure and conduct at Committee Meetings

9.2 Applicants and objectors will be able to address the Planning Committee in accordance with the protocol attached at **Appendix []**.

9.3 Where Councillors who are not members of the Planning Committee have indicated to the Chairman prior to Committee that they wish to speak on an item in their ward they will be entitled to speak immediately after representatives of the applicant and/or objectors have addressed Committee.

9.4 Planning law requires any decision to be taken in accordance with the development plan unless material considerations indicate otherwise. This means that any reasons for refusing an application must be justified with reference to the development plan or other material considerations. Councillors must give reasons for deciding to grant an application; this will be particularly useful in scenarios where the Councillors have overturned the Officers' recommendation or where the application is very controversial. Where the proposed development requires an environmental impact assessment, there is in fact a statutory requirement to provide reasons for granting permission.

9.5 Councillors should prepare in advance of the Committee meeting by reading relevant material/Committee papers and should request information not contained within the Officers' report/recommendation [at least one working day] before the Committee meeting. Councillors should not be involved in the decision-making if they have not prepared in advance or read the Officers' report/recommendation.

9.6 In making decisions on planning matters Councillors should:

- ensure that, if they call-in a proposal to go before the Planning Committee rather than be determined through officer delegation, that their reasons are recorded and repeated in the report to the Committee; come to meetings with an open mind and demonstrate that they are open-minded;
- comply with section 70(2) of the Town and Country Planning Act 1990 and make decisions in accordance with the development plan unless material considerations indicate otherwise;
- come to their decision only after due consideration of all of the information reasonably required upon which to base a decision. If they feel there is insufficient time to digest new information or that there is simply insufficient information before them, request that further information. If necessary, defer or refuse
- not vote or take part in the meeting's discussion on a proposal unless they have been present to hear the entire debate, including the Officers' introduction to the matter;
- have recorded the reasons for the Committee's decision to defer any proposal;
- make sure that if they are proposing, seconding or supporting a decision contrary to officer recommendations or the development plan that they clearly identify and understand the

planning and policy reasons leading to this conclusion/decision. These reasons must be given prior to the vote. Councillors must be aware that they may have to justify the resulting decision by giving evidence in the event of any legal challenge.

Committee decisions which differ from a recommendation of the Planning Officer.

- 9.7 Councillors can make decisions which are contrary to the Officers recommendation . This could be in relation to the entire decision or perhaps in relation to some of the specific conditions and/or planning obligations which are put forward by the Officers.
- 9.8 If a Councillor is concerned about an officer’s recommendation they should discuss their areas of difference and the reasons for that with the Development Manager in advance of the Committee meeting. This will allow the Development Manager to understand concerns, provide advice and support the Committee meeting with considered views on suggested alternatives.
- 9.12 Where a Councillor decides to vote against a recommendation, this should only arise once:
- (a) clear and convincing reasons have been provided with reference to the development plan policies and any other relevant planning considerations;
 - (b) the concerns have been articulated by the Councillor to allow other Councillors of the Committee to comment on them and Officers to advise on them; or
- 9.13 Where there is concern about the validity or strength of reasons, consideration should be given to the deferral of the item to another meeting to have the officer report reviewed to cover the salient points.
- 9.14 If the Committee wish to make a decision contrary to Officers recommendation, a planning officer present at the meeting should be given the opportunity to explain the implications of such a decision.
- 9.15 If the Committee wish to refuse an application the reasons for doing so must be clear, cogent and comprehensive. Councillors should be prepared to explain in full their planning reasons for not agreeing with the officer’s recommendation, which should be set in the context of the development plan or the National Planning Policy Framework. The decision and reasons for it must be minuted. The common law on giving a statement of reasons for decisions has developed significantly in the last few years. It is important that the report that supports planning decisions clearly shows how that decision has been reached – whether for the grant or refusal of permission. The procedure outlined in **Appendix []** should be followed (unless there are clear reasons for deviating from it).
10. **PLANNING APPEALS** Appeals by applicants against the decisions of the Council, and which are heard by an Inspector, are open to the public and Councillors are able to attend.
- 10.2 If Councillors wish to attend a public inquiry or informal hearing as ward Councillors they are free to do so but it is strongly recommended that they discuss their participation with the [Head of Planning] to ensure that they are aware of the process and that they do not act in a manner which may expose the Council to criticism or a claim of costs.
- 10.3 A Councillor cannot attend an appeal on behalf of the Planning Committee. The decision of the Committee will be documented in the minutes and the case officer will present the Council's case on its planning merits in accordance with the Committee's decision. The

Inspector is required to determine the appeal on its planning merits and therefore all representations should be so directed. Where the appealed decision was contrary to the officer recommendation the case may be presented by a planning consultant employed by the Council.

11. APPLICATIONS SUBMITTED BY THE COUNCIL/COUNCILLORS/OFFICERS

- 11.1 The Council is empowered to act as local planning authority in respect of certain planning applications that it has submitted to itself for development in respect of its own land. This allows the Council to grant planning permission for its own development.
- 11.2 A general principle underpinning such planning applications is that there must be a clear separation of functions between the part of the Council that is promoting the planning application and the part of Council that is tasked with determining the application. The Council must make appropriate administrative arrangements to ensure that there is a functional separation, when dealing with such applications, between the persons bringing forward a proposal for development and the officer responsible for the recommendation to planning committee. In addition, the Council's own development proposals should be treated in the same way as those of private developers.
- 11.3 Where appropriate, the Council will publish a Handling Note which details how such applications will be processed. The Council will publish this note on the relevant planning application web page.
- 11.4 Proposals to their own authority by serving Councillors and Officers can easily give rise to suspicions of impropriety. Proposals can take the form of either planning applications, development plan proposals or relate to other planning matters including enforcement. However, it is vital to ensure that they are handled in a way which gives no grounds for accusations or favouritism.
- 11.5 Accordingly a Councillor or an Officer making an application should follow the procedures set out below:
- (a) if a Councillor or an Officer submit their own proposal to the Council which they serve, they should take no part in its processing or the decision making process;
 - (b) Councillors who act as agents/consultants for people pursuing a planning matter with the authority should take no part in its processing or the decision making process;
 - (c) in the circumstances outlined at (a) and (b) above, such Councillors must not seek to influence the case officer's assessment or recommendation on the proposal;
 - (d) the Councillor or Officer concerned in (a) or (b) should inform the Monitoring Officer of such proposals no later than the date on which formal proposals are submitted.
- 11.6 All planning matters that relate to serving Councillors should be reported to the relevant Planning applications committee as main items and not dealt with by Officers under delegated powers. In addition, planning matters that relate to any member of the Corporate Management Team, and any person employed or engaged by the Planning and Legal Services team, must be dealt with in the same way and be determined by the Committee. The Committee report should make it clear that the applicant is a member or a relevant officer of the Council.
- 11.7 Enforcement matters relating to serving Councillors and Officers will also dealt with in the same way as any other enforcement case.
- 11.8 The Council's Monitoring Officer should be informed of any development proposals of the

Council or of any other planning matters relating to serving Councillors and Officers.

12. **TRAINING**

- 14.1 Councillors may not participate in decision making at meetings of the Planning Committees unless they have attended the mandatory planning training sessions prescribed by the Council on probity and planning. This includes Councillors who are acting as a substitute for regular Councillors of these committees.
- 14.2 All Planning Committee Councillors (and substitutes) should endeavour to attend any other specialised training sessions provided, since these will be designed to extend their knowledge of planning law, regulations, procedures, codes of practice and development plans, which will assist them in carrying out their role properly and effectively.

APPENDIX A

COUNCIL GUIDELINES FOR DETERMINING PLANNING APPLICATIONS

1. The emphasis in determining applications is upon a plan led system. Section 70(2) of the Town and Country Planning Act 1990 requires all planning applications to be determined by reference to the development plan if material to the application, and any other material considerations. Officers will advise what constitutes a material consideration.
2. Frequently referred to material considerations include government policy in the form of the National Planning Policy Framework, the National Planning Practice Guidance, proposals in the relevant development plan, previous planning decisions (including appeal decisions), and so forth.
3. Other examples of material considerations include (but are not limited to):
 - design, appearance and materials;
 - layout and density of building;
 - disabled persons' access;
 - effect on listed building and conservation area;
 - nature conservation;
 - traffic generation, highway safety and parking;
 - overshadowing, overlooking and loss of privacy;
 - noise, disturbance or other loss of amenities.
4. Examples of matters which are not material considerations include (but are not limited to):
 - reduction in property values;
 - loss of private view over the land;
 - boundary disputes, covenants or other property rights;
 - personal remarks (e.g. the applicant's motives).
5. The personal circumstances of an applicant for planning permission are not generally a material consideration because they do not relate to the character or use of the land. However, in exceptional circumstances they may outweigh other material planning considerations. Where this is the case, specific and valid reasons must be given to justify the exception.
6. What constitutes a material consideration is a matter of law. The weight to be attached to the consideration is a matter of planning judgement for the decision-maker having regard to the planning evidence.
7. It is essential to consider thoroughly any advice given by a statutory consultee or relevant government department, including views expressed by Historic England or the Environment Agency.
8. The views of local residents are relevant when determining a planning application, but it must be recognised that such opposition cannot be reason in itself for refusing or granting planning permission unless founded on valid planning reasons, which are supported by substantial evidence.

9. Account should be taken of previous Council decisions, appeal decisions in relation to the site, or other related appeal decisions.
10. It is not permissible to prevent, inhibit or delay development which could reasonably be permitted.
11. Planning conditions should only be imposed for a planning purpose and not for any ulterior one. They must fairly and reasonably relate to the development. Thus it is essential to avoid conditions which are unnecessary, unreasonable, unenforceable, imprecise or irrelevant.
12. A S106 legal agreement, or undertaking, includes obligations entered into by the developer, landowner and other relevant parties to mitigate the impacts of a development proposal. Planning obligations may only constitute a reason for granting planning permission if they meet the tests that they are necessary to make the development acceptable in planning terms. They must be:
 - necessary to make the development acceptable in planning terms;
 - directly related to the development; and
 - fairly and reasonably related in scale and kind to the development.
13. Planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition.

APPENDIX B
PLANNING COMMITTEE PROTOCOL

- [Meetings of the Planning Committee take place in the Council Chamber of the Council Offices at [Civic Offices, Bridge Street, Reading, RG1 2LU]¹.
- The Committee Manager will ask members of the public (including those wishing to speak) to sit at the back of the Council Chamber.
- Planning applications are dealt with in agenda order and it is impossible to predict how long it will take to debate each application.
- The Chairman will announce the application and invite public speakers by name to go to the place set aside for public speaking.
- Once any additional information has been reported, objectors will be invited to speak first, followed by supporters for up to [three]² minutes each. The time limit will be strictly enforced and the Committee Manager will warn you when you have only 30 seconds left.
- Representations should refer to planning policies as this may give the arguments more weight. If irrelevant issues are raised by public speakers, officers may offer comment to direct Councillors as to the appropriate weight to be placed on irrelevant considerations.
- After a public speaker has finished they will be asked to return to their seat. Although welcome to sit and listen to the debate, they are not permitted to take part in the discussion. Planning Committees are held in public but are not public debates and members of the public should not shout out comments when the matter is being debated. In the event that inappropriate disruption/comments continue then the Chairperson may ask that member of the public to leave the meeting.
- After public speakers have finished, any ward Councillors will be afforded the opportunity to address the Planning Committee for up to [three] minutes.
- Following this, the Planning Officer will offer any necessary factual clarifications and then the Planning Committee will debate the application, provide clear reasons for any motion (including specific and cogent references to planning policies and material considerations that support the position) and only then will they move to a vote.
- Councillors voting need to raise their arm clearly at the appropriate juncture so that the Committee Manager is able to properly register their vote.
- Usually the matter is determined but in a small number of cases, consideration may be deferred for the Planning Committee to visit the site or to receive further information.
- Once a vote has been taken, members of the public and ward Councillors need not stay, but are welcome to remain for some or the rest of the meeting if they so wish.
- The Chairman has responsibility for the smooth running of the meeting. His/her decision on procedural matters is final.]

¹ **WBD comment:** Council to confirm if this is the correct meeting location.

² **WBD comment:** Council to confirm the time limit.

APPENDIX []
SITE VISIT PROCEDURE AND PROTOCOL

[Council to consider whether it sees merit in introducing the above. Many other Councils do adopt this approach to regulate the number of site visits arranged or deferrals]