

Planning Applications Committee

29 April 2026



Reading
Borough Council
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Title	Responses to National Planning Consultations – UPDATE REPORT
Purpose of the report	To make a decision
Report status	Public report
Executive Director/ Statutory Officer Commissioning Report	Emma Gee, Executive Director Economic Growth and Neighbourhood Services
Report author	Mark Worringham, Planning Policy Manager / Acting Development Manager (Planning & Building Control)
Lead Councillor	Councillor Micky Leng, Lead Councillor for Planning and Assets
Council priority	Secure Reading's economic & cultural success
Recommendations	<p>Recommendation 1 as main report</p> <p>Recommendations 2-4 from main report amended as below.</p> <ol style="list-style-type: none">2. To note the response that has been that has been submitted to the Planning Committee Reform consultation3. To agree the response to the consultation on consulting the Secretary of State set out in this report.4. To agree the response to the consultation on fees for planning applications set out in this report.

1. Background

1.1 This report:

- Sets out the response that has been submitted to the consultation on planning committee reform
- Sets out a proposed response to the consultation on planning fees for Committee agreement
- Sets out a proposed response to the consultation on consulting the Secretary of State for Committee agreement.

2. Planning Committee Reform

2.1 The main report highlights the consultation on Planning Committee Reform, which closed on 23 April. A response was submitted by the deadline as set out below:

Question 1: Do you have any comments on the draft Regulations?

Whilst the Council understands the aims of increasing consistency across authorities in how planning committees function, we are particularly concerned that the approach set out in the draft Regulations would have the effect of substantially reducing democratic oversight and eroding trust in decision making. The Council is particularly concerned about the inability to call a Schedule 1 application into committee and the automatic delegation of reserved matters applications to officers unless they are part of a phased permission.

The ability for a councillor to call an application in to be dealt with at committee is a crucial part of ensuring democratic accountability within the planning system. It also allows the views of local residents and communities to be heard by committee and helps to build transparency and confidence in the system. In practice, call-in powers in our area do not act as a significant roadblock

on meeting our development needs and do not create an unmanageable workload for committees or for officers. The negative impacts of preventing call-ins of Schedule 1 applications would seem to outweigh the advantages, and we would suggest that this instead be dealt with by stronger guidance on when a call-in would be appropriate.

In terms of reserved matters, we are increasingly seeing outline applications with very broad parameters around matters such as the mix of uses and the design of the development. This means that there are still significant decisions with wide-ranging impacts on communities to be made at reserved matters stage. For instance, whilst the height of tall buildings may be set at outline stage, their final design, which is vital to the understanding of how they will impact surrounding areas, is often left to reserved matters. Communities would rightly expect these decisions to be made through established democratic processes and therefore in our view, reserved matters applications for major developments should be in Schedule 2.

It is not clear to us what the rationale is for inclusion of some types of application in either Schedule 1 or 2. For instance, on our reading of the draft Regulations, a minor application would always be delegated to officers under Schedule 1, but a variation of condition on a minor permission could potentially come to committee under Schedule 2, subject to passing the relevant tests, even though the variation may raise far fewer issues than the initial permission. Likewise, a minor retrospective application could also come to committee. In these cases, the main consideration on whether an application ought to be eligible to be determined at committee ought to be scale rather than the specific type of application.

The Council has no objection to the proposed limit of 13 for committee membership in Regulation 7, and our committee membership currently complies with this.

The date for implementation of 30 September in Regulation 1 seems ambitious to have undertaken changes to the constitution, particularly since the outcome of this consultation is not yet known.

Question 2: Do you agree with our proposed approach to phased reserved matters applications? If not, do you think we should return to the original position of reserved matters on phased development being delegated in all circumstances or should we instead consider delegating certain types of phased reserved matters applications?

Subject to the comments in relation to question 1 relating to reserved matters, the Council agrees that phased reserved matters applications should be considered at planning committee.

Question 3: Do you have any comments on the draft guidance?

It would be useful if the guidance were to make clear whether an authority's constitution could set out the circumstances under which a Schedule 2 application would be referred to committee (based for instance on size thresholds) or whether this would always need to be a case-by-case decision made by the nominated officer and member. Making this a case-by-case decision risks a great deal of uncertainty about timescales and process, particularly since the level of environmental, social or economic effects of in terms of the development plan may not be immediately clear on receipt of the application, as well as inconsistency. The Council believes that it is clearly preferable for all parties for the constitution to set out precisely which applications will be decided at committee.

3. Consulting the Secretary of State

3.1 The main report outlined the consultation on consulting the Secretary of State on planning applications, and recommended that a response be agreed. The proposed response is set out below.

Question 1: Do you agree with this proposed consultation requirement for applications for large-scale, strategic commercial development where an LPA is minded to refuse?

The Council agrees that it would be logical to have a corresponding consultation requirement for large-scale commercial alongside the proposed residential requirement, but considers that the threshold proposed is too low (see response to question 2).

Question 2: Do you consider the proposed area threshold of 15,000m² or more to be appropriate?

The proposed 15,000 sq m threshold is too low. A single large office building can easily exceed 15,000 sq m and remain of primarily local significance and not of strategic importance. We would suggest that 50,000 sq m is a more accurate threshold for the scale of development that is of genuine strategic importance and should be used for these purposes.

Question 3: Do you agree with the proposed consultation requirement for applications relating to land owned or leased by the NDA or its subsidiaries where the LPA is minded to refuse?

The Council does not wish to respond to this question.

Question 4: Do you agree with the proposed consultation requirement for applications relating to nuclear fuel cycle facilities where the LPA is minded to refuse?

The Council does not wish to respond to this question.

Question 5: Do you agree with this proposed consultation requirement for applications for residential development within a Defence DEPZ where the LPA are minded to grant permission and the Office for Nuclear Regulation and/or a LPA's Emergency Planning Team maintains an objection?

The Council understands the reasoning for this proposal, and does not object to it, as in most cases the relevant authorities have policies in place that would generally lead to a refusal where the ONR advises against development.

With the Detailed Emergency Planning Zones around nuclear facilities being recognised in the draft National Planning Policy Framework and this consultation, it is clear that emergency planning concerns are likely to be given very substantial weight. However, there needs to be a recognition of the impacts this will have on the affected local planning authorities meeting their development needs. In the case of Reading, 8% of the Borough's total area falls within the DEPZ of AWE Burghfield, and this is one of the few areas of Reading where there is still significant development potential. This should be reflected as a strategic constraint on an authority in meeting its needs within national policy or reflected in how those needs are calculated in the first place.

Question 6: Do you agree that one dwelling is the correct threshold for referral?

Yes.

4. Fees for planning applications

4.1 The main report outlined the consultation on fees for planning applications and recommended that a response be agreed. The proposed response is set out below. There are a large number of questions in the consultation, so only those questions where a response is proposed are shown.

Question 1: Do you support the proposed National Default Fee Schedule, set at 90% of full estimate cost?

Yes. There will be some natural variation in costs across the country, so a default schedule set at 90% of the estimated average is a reasonable approach.

Question 2: Are there any proposed fees in the National Default Fee Schedule that you consider to be unrepresentative of 90% of estimated full cost levels for LPAs (either too low or too high)?

We have not undertaken sufficient work to fully answer this question, but we continue to have concerns that the fee for prior approvals that would result in residential development is very low, at less than half the equivalent fee for a change of use application to residential. Prior approval applications have become increasingly complex and entail a significant number of consultations with other internal or external consultees, and we are not convinced that the proposed fee is likely to cover 90% of the costs in practice.

Question 3: Do you support the proposed changes to the fee structures for outline, full and reserved matters applications for residential and non-residential development as set out in the proposed National Default Fee Schedule?

Yes. The proposed fee structures represents a relatively modest change to the existing structure which will minimise confusion when changes are introduced, but also represents a useful simplification, whilst ensuring that fees cover as much of the cost of processing an application as possible.

Question 8: Do you think the three-band fee structure currently used for section 73 applications remains appropriate? If no, what changes would you propose and why? Please provide evidence to support your view.

Question 9: Should section 73 and section 73B applications be charged using the same fee structure? Please explain your reasoning.

Since a Section 73B application can be used to alter the description of development, the potential changes to the permission that this could entail are more significant than a Section 73 application, despite the qualifier that the effect should not be substantially different from the existing permission. This could potentially nevertheless allow for additional dwellings on a large residential development, for example. We are therefore concerned that the proposed default fee for a Section 73B application may not cover the costs of processing the application.

Question 10: Do you think the fee for discharging conditions should be charged per condition rather than per application? If yes, what do you consider to be an appropriate fee per condition? Please provide evidence to support your view.

The fee should be charged per condition, because this would reflect the cost of the work proposed. We do not currently have the evidence to point towards a specific fee.

Question 11: Should applications for the approval of biodiversity gain plans be subject to a separate fee to reflect the specific work involved? If yes, what do you consider to be an appropriate fee level? Please provide evidence to support your view.

Yes. Biodiversity gain plans are a unique type of application with specific consultation requirements. For those authorities without in-house ecology advice, determining these applications will require consultant support, which carries a cost. We do not currently have the evidence to point towards a specific fee.

Question 17: Do you agree with our working proposal that the planning fee surcharge should be in the region of 10% of the national default fee (subject to further policy development and consultation)?

At this stage we consider that the 10% surcharge appears reasonable, and we do not have any information that would suggest an alternative level. We note that this proposal still needs to be considerably worked up so that we have an understanding how it will work in practice.

Question 18: Do you have any comments on how local fee setting will operate? In particular, is there any additional information that you would wish to see covered through guidance?

We welcome the guidance on local fee setting, and consider that this is a vital measure to ensure that local planning authorities' planning functions can be adequately funded. We are concerned that the guidance prevents the funding of other planning functions including policy and enforcement. These budgets are under considerable pressure in many authorities, in particular enforcement as a non-statutory service, but are still a critical element of operating a planning function for which there are few alternative funding mechanisms other than central budgets. It would be unfortunate if this opportunity was missed to enable the whole planning function to operate independently of central budget pressures.

Question 19: Do you think local fee variations should be capped? If so, what level would be appropriate - 15%, 25% of the national default fee, or another figure?

- **yes - 15%**
- **yes - 25%**
- **yes - other (please specify)**
- **no**
- **unsure**

No. The whole purpose of local fee setting is intended to be for planning authorities to cover the costs of determining planning applications. If local work demonstrates that these costs vary by more than a set percentage of the national default fee, then the fee should cover those costs without an arbitrary cap being applied.