

By email to
[mailto: pcu@communities.gov.uk](mailto:pcu@communities.gov.uk)

Rachel Armstrong
policy@planningofficers.org.uk

28 April 2026

Dear Sir/Madam

Consulting the Secretary of State on planning decisions – POS Response (online reference ANON-6A4F-KKTC-X)

The Planning Officers Society (POS) welcomes the opportunity to comment on this consultation, published 23 March 2026. We have submitted our responses via the online consultation platform; however, that format does not allow us to provide the necessary explanation, reasoning, or caveats to accompany our answers. As we consider this contextual information essential to understanding the basis for our responses, please consider the detailed rationale set out below alongside the answers we have provided online.

Question Number	Question	POS response
1	Do you agree with this proposed consultation requirement for applications for large-scale, strategic commercial development where an LPA is minded to refuse?	<p>No.</p> <p>Reasons:</p> <p>LPAs already operate within a robust statutory framework, and existing call-in powers are sufficient to capture genuinely strategic commercial proposals. A new mandatory consultation step would introduce avoidable delay, duplicate existing mechanisms, and undermine confidence in the plan-led system. It could also divert scarce planning officer resources away from decision making.</p> <p>If government introduces further notification processes, they must be properly resourced so decisions can be made in a timely and efficient manner. Without sufficient capacity there is a significant risk of slowing planning determinations and delaying project delivery.</p>

2	Do you consider the proposed area threshold of 15,000m ² or more to be appropriate?	<p>No.</p> <p>Reason:</p> <p>15,000m² is too low and would capture many routine commercial and logistics schemes that are not nationally strategic. This risks unnecessary referrals, increased administrative burden, and slower decision-making.</p> <p>A more evidence-based and nuanced approach is needed.</p>
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?	<p>Yes, in principle.</p> <p>Reason:</p> <p>We recognise the national importance of nuclear decommissioning and the need for timely delivery. Ministerial visibility may be appropriate where refusals could affect nationally significant programmes.</p> <p>Clear guidance, streamlined processes, and alignment with regulatory pathways are essential to ensure proportionality.</p> <p>If further notification processes are introduced, Government must be properly resourced so that decisions can be made in a timely and efficient manner. Without sufficient capacity there is a significant risk of slowing planning determinations and delaying project delivery.</p>
4	Do you agree with the proposed consultation requirement for applications relating to nuclear fuel cycle facilities where the LPA is minded to refuse?	<p>Yes, in principle.</p> <p>Reason:</p> <p>Given the strategic importance of the UK's nuclear fuel cycle, it is reasonable for the Secretary of State to be notified where an LPA is minded to refuse. This should be supported by clear definitions, alignment with ONR and permitting processes, and a streamlined notification route.</p> <p>However, if further notification processes are introduced, Government must be properly resourced so that decisions can be made in a timely and efficient manner. Without sufficient capacity there is a significant risk of slowing planning determinations and delaying project delivery.</p>
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	<p>Yes, subject to proportionality and clarity.</p> <p>Reason:</p> <p>We recognise the exceptional public-safety considerations in Defence DEPZs. A targeted notification requirement is appropriate where unresolved safety objections remain. Clear thresholds, consistent</p>

	Nuclear Regulation and/or a LPA's Emergency Planning Team maintains an objection?	<p>technical advice, and a streamlined process are essential.</p> <p>However, POS does question the need for a mandatory requirement which applies to only four LPAs.</p> <p>If government introduces further notification processes, they must be properly resourced so decisions can be made in a timely and efficient manner.</p>
6	Do you agree that one dwelling is the correct threshold for referral?	<p>No.</p> <p>Reason:</p> <p>A one-dwelling threshold is disproportionate and would capture minor, low-impact proposals. A higher, evidence-based threshold is needed to ensure only developments with meaningful population-impact implications are referred.</p>

As always, POS is happy to discuss these issues further with the Ministry.

Yours faithfully

Mike Kiely
POS Chair

POS is the single credible voice for public sector planners, pursuing good quality and effective planning practice. The Society's aim is to ensure that planning makes a major contribution to achieving sustainable development in ways that are fair and equitable and achieve the social, economic and environmental aspirations of the community.

We operate in three main ways:

- *As a support network for planners in the public sector*
- *As promoters of best practice in planning*
- *As a think tank and lobbying organisation for excellence in planning practice*

Where we can, we will work across the sector to craft proposals that have widespread support from the people who operate the planning system at the coalface: landowners, developers, agents, legal, local authorities and politicians. We will be both radical and practical as we look for solutions to tangible problems that will make a real difference to crucial areas. Our objective is to improve the planning system to enable it to deliver its key aim of sustainable development. It is within this context that we have set out this advice to Government so we can plan together for a better future.