Planning committee modernisation

Lead department	Ministry of Housing, Communities and Local Government
Summary of proposal	The proposal is to introduce secondary legislation establishing a National Scheme of Delegation for planning decisions in England. The Regulations would require specified categories of planning applications to be determined by planning officers and would allow other categories to be referred to planning committee only where specified gateway criteria are met and a nominated planning officer and nominated committee member agree referral.
Submission type	Impact Assessment – 4 June 2026
Legislation type	Secondary legislation
Implementation date	31 October 2026
RPC reference	RPC-MHCLG-26173-IA(1)
Date of issue	16 July 2026

RPC opinion

Rating[1]	RPC opinion
Fit for purpose	The IA provides a sufficient rationale for intervention, identifying problems in the current planning decision-making process. It would, however, be strengthened by distinguishing more clearly between the problems requiring intervention and wider objectives or policy-design principles. The IA identifies a range of regulatory and non-regulatory options and carries forward two legislative do-something options for monetised appraisal. However, the consideration of non-regulatory alternatives and the explanation of how the longlist was generated and filtered should be developed further. The IA provides sufficient quantitative and qualitative analysis to support selection of the preferred option. Given the scale of the estimated impacts, the IA should strengthen the explanation for the key assumptions underpinning the benefits. It should also justify the classification of business impacts as direct or indirect, because this materially affects the EANDCB.

[1] The RPC opinion rating is based only on the robustness of the rationale, options identification (including SaMBA) and justification for preferred way forward, as set out in the Better Regulation Framework guidance. RPC ratings are fit for purpose or not fit for purpose.

RPC summary

Category	Quality[2]	RPC comments
Rationale	Green	The IA sets out a sufficient problem statement, supported by evidence on committee referrals, appeals and delays. However, some issues presented as problems requiring intervention are better understood as objectives or policy-design principles. The 'SMART' objectives should define more clearly how quality, speed and "most impactful applications" will be judged.
Identification of options (including SaMBA)	Green	The IA identifies a sufficient but relatively narrow longlist, including a non-regulatory option and less and more restrictive variants of the preferred approach. It would be strengthened by explaining more systematically how options were generated and filtered against objectives and critical success factors. The SaMBA is sufficient.
Justification for preferred way forward	Green	The IA monetises two legislative do-something options and provides sufficient analysis to support selection of the preferred option. The IA should strengthen the explanation of and where possible, evidence for, assumptions on committee referrals, appeal reductions, the use of residential evidence for commercial applications and particularly the assumed time savings for major and minor applications, which account for 58% of the benefits.
Regulatory Scorecard	**Satisfactory**	The scorecard presents monetised welfare, business, household and public sector impacts and provides narrative on non-monetised impacts. It would be improved by clearer explanation and justification of which business impacts are direct and included in the EANDCB, because this materially affects the estimate. It should also provide more detail on distributional impacts beyond business size, and stronger evidence for impacts on the business environment, trade and natural capital.
Monitoring and evaluation	**Satisfactory**	The IA commits to statutory review by 31 October 2028, monitoring of delegated and committee-referred cases, and process, impact and value-for-money evaluation as part of wider planning reform evaluation. The M&E plan would be strengthened by clearer research questions, metrics, baselines, data sources, timing and a clearer approach to attribution given concurrent planning reforms.

[2] The RPC quality ratings are used to indicate the quality and robustness of the evidence used to support different analytical areas. The definitions of the RPC quality ratings can be accessed here.

Summary of proposal

The Ministry of Housing, Communities and Local Government's (MHCLG) proposal is to introduce secondary legislation to implement a National Scheme of Delegation (NSD) for planning decisions in England. The proposal follows powers in the Planning and Infrastructure Act 2025 and is intended to provide greater clarity and consistency about which planning applications should be determined by planning officers and which may be referred to planning committees.

The Impact Assessment (IA) explains that the Regulations categorise planning applications into two groups. Schedule 1 identifies application types that must be delegated to planning officers in all cases. Schedule 2 identifies application types that are presumed to be delegated to officers unless the application meets specified gateway criteria and the nominated planning officer and nominated planning committee member agree that it should be referred to committee. Applications outside Schedules 1 and 2 remain for local planning authorities (LPAs) to determine through their local constitutions.

The preferred option is a two-tier NSD with a gateway test for referral to committee. Schedule 1 includes householder, minor residential and minor commercial development, and some supplementary and technical consents. Schedule 2 includes other applications for planning permission not in Schedule 1, variations of permissions and special controls such as listed building and tree preservation order consents.

The IA also considers two sub-options for reserved matters applications. The final recommendation is that reserved matters applications associated with outline applications of 500 or more dwellings, or floorspace of 50,000 square metres or more, are placed in Schedule 2 and may therefore receive committee consideration if the gateway test is met.

The IA identifies five longlist options:

- Option 0: Business as usual
- Option 1: Non-legislative option, relying on guidance and training
- Option 2: A less restrictive legislative option, delegating applications where they comply with the development plan
- Option 3: The preferred two-tier NSD with a gateway test
- Option 4: A more restrictive legislative option, with delegation as default and a prescriptive list of exceptions.

The IA carries forward options 2 and 3 for monetised appraisal, with business as usual used as the counterfactual. It estimates, under the central trajectory aligned with the Office for Budget Responsibility (OBR), that option 2 has a net present social value (NPSV) of £600.8 million and equivalent annual net direct cost to business (EANDCB) of -£68.7 million, while the preferred option has an NPSV of £824.8 million and EANDCB of -£93.9 million. It also reports a preferred-option business net present value (BNPV) of £808.2 million and equivalent annual net direct cost to households (EANDCH) of -£0.2 million.

The monetised benefits are driven primarily by reductions in determination times, reductions in appeal-related delay and reductions in appeal-related costs. The IA reports that, under the OBR-aligned central trajectory, the preferred option generates net present value (NPV) benefits of £477.7 million from reduced determination times, £235.9 million from reduced appeal time, £94.6 million from reduced appeal-related costs to developers, £1.9 million from reduced appeal-related costs to households and £14.7 million from reduced appeal-related costs to the public sector.

Rationale

Problem under consideration

The IA states that planning committees are a critical part of the planning system but are not operating as effectively as possible. It identifies several contributing issues: local schemes of delegation may not be sufficiently clear; too much committee time may be spent on minor or technical applications; some applications are refused against planning officer advice and later overturned on appeal; and there may be insufficient transparency about the consequences of planning committee decisions.

The IA provides evidence on the scale and nature of the problem. It states that most planning decisions made by LPAs are delegated to planning officers, but that nearly 40% of major residential decisions are estimated to be made by committee. The IA cites Lichfields analysis that 33% of major residential appeals follow from decisions where planning committees refused an application against officer recommendation and that 79% of these appeals are overturned. It also cites MHCLG analysis of Planning Inspectorate (PINS) casework data indicating that the appeals process can add around 200 days of delay, though the department should clarify whether this 200 days of delay is a mean, median, maximum or other measure, and how representative it is of the appeals affected by the proposal. If the figure represents an upper-end estimate rather than an average, the IA should present a more representative measure or explain why the estimate remains appropriate for appraisal.

The IA also draws on evidence from a Planning Advisory Service survey that committees typically meet monthly and discuss two to four applications per meeting. It argues that this creates delays associated with waiting for committee slots and may particularly affect smaller applications and small and micro-business (SMB) developers. The IA would benefit from situating this within the context of typical demand for application discussion slots and backlog sizes.

The IA provides a sufficient account of the core problem but should distinguish more clearly between problems under consideration and wider objectives or policy-design principles. Unclear delegation rules, delays, inefficient committee use and avoidable appeals are clearly understood as problems. In contrast, retaining local democratic oversight and supporting the attractiveness of the planning profession are better understood as objectives, constraints or intended benefits unless the IA evidences the underlying harm, their scale and the mechanism by which the proposal would address them.

The IA would be strengthened by more explicitly framing the problem as a regulatory or institutional failure in local planning decision-making. The IA explains that local schemes of delegation can vary and that legislation is needed to ensure uniformity, but it should draw this together more clearly as the rationale for national intervention.

Argument for intervention

The IA argues that the framework for planning committees is largely set out in local government legislation and that reforms to modernise planning committees therefore require legislation. It states that guidance or recommendations could be issued to LPAs but would not ensure uniformity across the system or ensure that planning committees operate in the same way. This provides a reasonable case for intervention and is supported by the explanation that standardising delegation rules can reduce uncertainty, streamline decision-making, reduce unnecessary appeals and allow planning committees to focus on applications where local democratic oversight is most appropriate.

The IA would be strengthened by explaining more clearly why current local discretion creates inefficiency or uncertainty that cannot be addressed sufficiently through strengthened guidance, model schemes of delegation, transparency requirements or other non-legislative measures. The IA considers a non-legislative option and explains that the Planning Advisory Service already provides guidance and training, but it could provide a fuller evidence-based explanation of why this option would not achieve the desired consistency.

The IA draws on consultation and stakeholder engagement evidence. It states that a working paper was published, workshops and meetings were held with planning authorities, council members, planning committee chairs and relevant networks, and further consultation was undertaken on detailed proposals and on draft Regulations and statutory guidance. This provides useful evidence on policy development and stakeholder views.

The IA relies mainly on English planning data, consultation evidence and internal analysis of committee reports. The evidence base would be strengthened considering applicable previous evaluations, post-implementation reviews and evidence from elsewhere in the UK or internationally, where available.

Objectives and theory of change

The IA sets out two ‘SMART’ objectives: improving the quality and speed of decision-making, and ensuring planning committees focus on the most impactful applications. Each objective is described under specific, measurable, achievable, realistic and time-limited headings. These objectives are relevant to the problem under consideration, but they are framed closely around the preferred intervention rather than as policy-neutral objectives used to generate and filter options. The IA should define how “quality” and “speed” will be judged and should explain how “most impactful applications” will be identified. The IA appears to rely in part on reductions in applications where committees overturn officer recommendations as a measure of committee focus and decision quality. This is relevant, but it does not by itself establish that remaining committee applications are the most impactful. The IA would also benefit from a clearer distinction between why the objectives are expected to be achievable and why the expected outcomes are realistic in practice.

The IA includes a logic model setting out inputs, mechanisms, short-term outcomes and long-term outcomes. This is a useful structure, but it would be strengthened by identifying the key assumptions underpinning the main causal links, particularly between delegation to officers, appeals and reductions in delay.

Identification of options (inc. SaMBA)

Identification of the 'longlist' of options

The IA identifies a sufficient but relatively narrow longlist of options, including business as usual, a non-legislative option, a less restrictive legislative option, the preferred two-tier NSD and a more restrictive legislative option. These options provide a meaningful range of approaches with different levels of prescription, local discretion and expected impact on committee involvement.

The IA explains that the longlist was informed by consultation and engagement, including a working paper, workshops with planning authorities, engagement with council members and planning committee chairs, and consultation on detailed proposals and draft Regulations. The IA would be strengthened by setting out the process followed for identifying the options longlist in a structure more explicitly aligned with the Green Book options framework filter. It would also benefit from explaining how the criteria used in the options table relate to critical success factors such as strategic fit, achievability, affordability, value for money and stakeholder acceptability.

The IA assesses the longlist against two policy objectives, business impact and SMB impact, and records whether each option is taken forward to the shortlist. The IA would, however, benefit from a more systematic explanation of how the longlist was generated and filtered.

The IA should also explain more clearly how the options interact with other planning reforms. The monitoring and evaluation (M&E) section notes that planning committee changes will coincide with wider planning system reforms, but the options section could better explain how those interactions affect the generation and appraisal of options.

Consideration of alternatives to regulation

The IA includes a non-legislative option based on guidance and training. It explains that the Planning Advisory Service already publishes guidance, offers training to committee members and provides peer review challenges, but that these measures do not provide the clarity and consistency the Government is seeking. This provides some consideration of alternatives to regulation, but the assessment remains relatively high level. The IA would be strengthened by providing a more developed assessment of why enhanced guidance, training, model schemes of delegation or transparency measures would not materially address the problem, particularly if combined with monitoring or public reporting.

Justification for the shortlisted options

The IA takes forward options 2 and 3 to the shortlist. It explains that business as usual would not meet the objectives, that the non-regulatory option would not sufficiently meet the objective of improving quality and speed of decision-making, and that the more restrictive legislative option would not sufficiently meet the objective of retaining effective local democratic oversight.

The IA provides sufficient justification for the shortlist, but the explanation should be strengthened. It carries forward a meaningful comparator to the preferred option: a less restrictive local-plan-aligned NSD. This allows the IA to compare the preferred two-tier NSD with a do-something option that would produce similar but smaller effects. However, the IA should explain more clearly why the non-regulatory option and the more restrictive regulatory option were not carried forward to monetised appraisal, particularly given the scale of estimated impacts. The IA should also explain why appraising two do-something options is sufficient to support the preferred way forward.

The IA should explain more clearly how the preferred option was developed relative to the local-plan-aligned option, particularly as the local-plan-aligned approach was previously presented as the preferred option in the Planning and Infrastructure Bill IA. The IA provides some explanation, including the proportion of LPAs with up-to-date local plans, but should make clearer what new evidence or policy judgement led to the preferred approach changing and how this affected the options appraisal.

The IA should also clarify the treatment of business as usual. The IA uses business as usual as the counterfactual rather than as a monetised shortlist option. This is acceptable, but the IA should clearly distinguish between options discarded because they do not meet objectives and the baseline used for appraisal.

SaMBA and medium-sized business (MSB) assessment

The IA provides a sufficient SaMBA. It identifies developers as the primary affected businesses and explains that small and micro developers are particularly vulnerable to planning delays and uncertainty. It refers to survey evidence that 76% of small and medium-sized enterprise developer respondents cited delays in the planning process as one of the top three supply-side factors limiting their ability to deliver new homes.

The IA explains that smaller developers may be more exposed to planning risk because each site may account for a larger share of their portfolio, because they may lack in-house legal and planning specialists, and because fixed planning costs can be higher per unit on smaller sites.

The IA explains why an exemption for small and micro businesses is not appropriate. It states that exempting SMBs from the NSD would be detrimental to SMBs and reduce the effectiveness of the intervention, because the preferred option is expected to benefit SMBs by reducing delays and uncertainty for the smaller applications that they are more likely to bring forward. This is a reasonable explanation for not applying an exemption as the IA's central argument is that the proposal reduces burdens and uncertainty on affected businesses. The IA therefore provides sufficient evidence to support its argument that exemption would undermine, rather than protect, the interests of SMBs.

The IA would be strengthened by distinguishing more clearly between SMBs and MSBs, and by explaining whether medium-sized developers face similar or different impacts. It would also benefit from clearer quantified evidence on the share of benefits expected to fall to each group, using application type, site size or business size proxies where direct evidence is unavailable.

The IA relies on imperfect proxies, including Competition and Markets Authority evidence on smaller developers and standard industrial classification code business counts for construction of residential and non-residential buildings. The IA recognises definitional limitations, including that some evidence defines smaller developers by units built per year rather than by employee numbers. This is acceptable for a sufficient SaMBA, but the IA should present the limitations of these proxies clearly to improve the IA.

Justification for preferred way forward

Appraisal of the shortlisted options

The IA provides a monetised appraisal of option 2 and option 3. It estimates that, under the OBR-aligned central trajectory, option 2 has an NPSV of £600.8 million, while the preferred option has an NPSV of £824.8 million. It estimates EANDCBs of -£68.7 million for option 2 and -£93.9 million for option 3.

The IA explains that both options generate benefits through reductions in determination times and appeals. It explains that the preferred option generates greater benefits because it delegates more major applications and all minor and householder applications to planning officers, while retaining flexibility through the gateway test for applications where committee consideration remains appropriate.

The IA provides a detailed modelling approach. It segments planning applications into major residential, minor residential, major commercial, minor commercial and householder categories. It estimates application volumes, committee involvement, relevant appeals, appeal types, time savings, appeal-related costs and capital holding costs.

The IA uses a 10-year appraisal period, 2026 price base year and 2026 present value base year. It provides an OBR-aligned central trajectory and an alternative trajectory aligned with delivering 1.5 million homes. It also provides low, central and high scenarios for the preferred option.

This provides a sufficient appraisal to support the preferred option, although material uncertainties remain in several of the assumptions underpinning the monetised impacts.

The largest monetised benefit is the estimated reduction in determination times. The IA assumes time savings of 30 days for major applications and 60 days for minor applications, generating £477.7 million in present-value benefits, equivalent to 58% of total quantified benefits. The IA describes the basis for the specific time-saving assumptions as anecdotal. The Planning Advisory Service survey provides evidence that most committees meet monthly and commonly consider two to four applications at each meeting, but it does not establish the 30-day and 60-day estimates. Given the weight these assumptions carry in the benefit case, the IA should provide a stronger empirical basis or explain more fully why the estimates and associated ranges are reasonable for appraisal purposes. It should also show how the preferred option performs under alternative plausible time-saving assumptions.

The central assumption that the preferred NSD reduces the number of major applications decided by committee by 30%, with a low to high range of 20% to 40%, is material. The IA explains that robust quantifiable evidence will not be known until the changes are in place and that the assumption reflects informal soundings with LPAs. The IA should provide a fuller explanation of these soundings, the basis for the scenario range and why the central estimate is considered reasonable.

The appeal-reduction assumptions are also material. The IA assumes a 45% reduction in appeals relating to refusals by committee against officer recommendation for major applications under the preferred option, with all relevant minor and householder appeals eliminated because those application categories are automatically delegated to officers. The IA should explain more clearly how these assumptions relate to the evidence on committee refusals, local plan compliance, officer recommendations and appeal outcomes.

The IA should also strengthen its treatment of commercial applications. It states that there is more data for residential applications than commercial applications and that, where commercial-specific data is lacking, commercial applications are assumed to be considered in the same way as residential applications. The IA should explain the sensitivity of results to this assumption and whether any commercial-specific evidence could be used to test it.

Selection of the preferred option

The IA selects the two-tier NSD with gateway test as the preferred option. It explains that the preferred option is expected to deliver higher benefits than the local-plan-aligned NSD because it delegates more applications, including all minor residential, minor commercial and householder applications, while still preserving committee consideration for complex or contentious development through the gateway test.

The IA also explains the selection of sub-option 3b for reserved matters applications, under which reserved matters associated with outline applications of 500 or more dwellings or 50,000 square metres or more are placed in Schedule 2 rather than automatically delegated. This responds to consultation feedback and preserves a larger role for committees for large-scale multi-phase developments.

The IA provides sufficient justification for the preferred option. It compares options 2 and 3 quantitatively and explains the policy trade-off between greater certainty and efficiency on the one hand and local democratic oversight on the other.

The IA would be strengthened by explaining more clearly whether the evidence gaps could affect the ranking of options 2 and 3. The preferred option remains higher-benefit under the central scenarios presented, but the IA should explain whether plausible alternative assumptions about major-application gateway use, appeal reductions, and the treatment of reserved matters applications could materially change the relative performance of the options. The direct/indirect classification materially affects the EANDCB, though any changes would not necessarily affect the wider NPSV comparison.

The IA should also explain more clearly how the preferred option balances the Government's aim of improving planning speed and certainty with retaining democratic oversight. This should include a clearer explanation of how the gateway criteria are expected to operate in practice and how guidance will support consistent implementation across LPAs.

Regulatory Scorecard

Part A

Total impacts including non-monetised and distributional impacts

The scorecard summarises the preferred option's monetised welfare impacts, including the IA's central NPSV estimate of £824.8 million under the OBR-aligned trajectory. The wider IA presents low and high estimates of £579.3 million and £1,126.0 million, and an alternative trajectory aligned with delivery of 1.5 million homes under which the central NPSV increases to £1,098.8 million.

The IA identifies the main monetised benefits as reductions in costs of holding capital related to determination times, reductions in costs of holding capital related to appeals, reductions in appeal-related costs to developers, reductions in appeal-related costs to households, and reductions in appeal-related costs to the public sector. The scorecard provides a useful summary of these impacts.

The wider IA also discusses non-monetised impacts, including potential wider housing supply effects, faster processing of applications still going to committee, reduced costs for LPAs and PINS, potential effects on investment confidence, and environmental impacts from any additional housing delivered.

The scorecard would be improved by reflecting more clearly the likely scale and uncertainty of key non-monetised impacts, including housing supply effects. The IA should explain why these impacts have not been quantified, and whether any bounded or illustrative assessment would be proportionate.

The scorecard should also reflect the wider IA's discussion of potential welfare risk associated with applications that might be approved by officers but would otherwise have been refused by committees and upheld at appeal. The IA should explain how this risk has been considered in the overall welfare assessment.

Impacts on business, including non-monetised and distributional impacts

The scorecard summarises the IA's estimated business impacts, including a preferred-option business NPV of £808.2 million and an EANDCB of -£93.9 million under the OBR-aligned central trajectory. The wider IA identifies the main monetised business benefits as reductions in capital holding costs from shorter determination times, reductions in capital holding costs from avoided appeals, and reductions in appeal-related costs to developers. The IA treats these benefits as direct and includes them in the EANDCB.

The IA explains that no administrative costs to business are expected because the measure changes LPA processes and does not require businesses to change how they submit planning applications. It also states that no business familiarisation costs are expected for the same reason.

The IA should explain more clearly and justify which business impacts are treated as direct and included in the EANDCB, because these classification judgements materially affect the estimated impacts. The proposal directly changes the process by which LPAs determine applications, but some estimated benefits depend on additional behavioural and counterfactual assumptions, including use of the gateway test and differences between officer and committee decisions. The IA should therefore explain why these effects are considered to follow immediately and unavoidably in the affected market in relatively few steps in the logic chain from the regulatory provision to the business impact, and which impacts should instead be treated as indirect business impacts or wider NPSV impacts.

The scorecard should also distinguish more clearly between impacts that are included in the EANDCB and impacts that are included only in the wider NPSV. If the department considers avoided appeal costs and avoided appeal delay to be direct impacts, it should explain why there are sufficiently few steps in the logic chain between the regulatory provision and the business impact, and why the effects are sufficiently immediate and unavoidable.

The scorecard would be strengthened by drawing more clearly on the wider IA's discussion of the number and type of businesses expected to benefit, including the relationship between application types, developer size and business size.

The wider IA identifies that smaller businesses are more burdened by delays and costs associated with securing planning permission, but that the overall benefit may be larger for larger developers because larger sites are more likely to go to committee. This is an appropriately balanced statement. The scorecard would be strengthened by summarising more clearly how impacts differ across developer types, application types and business sizes.

Impacts on households, individuals or consumers, including non-monetised and distributional impacts

The scorecard summarises the IA's household impacts, including a household NPV of £1.9 million and an EANDCH of -£0.2 million. The wider IA explains that household savings arise from reduced appeal-related costs for householder applications, because householder applications are in Schedule 1 and must be delegated to planning officers.

The IA states that no administrative costs to households are expected, because the proposal changes LPA processes and does not require any change in household behaviour. It also states that householders do not benefit from capital cost savings using the land-financing method because householder developments involve changes to an existing dwelling that is already owned.

The scorecard's treatment of direct household impacts is proportionate. It would be improved by distinguishing more clearly between households as householder applicants and households as potential beneficiaries of wider housing availability and affordability impacts. The wider IA discusses the latter qualitatively but does not quantify them.

The IA states that no significant or adverse distributional impacts are identified for households. The scorecard would be strengthened by reflecting whether any household groups, regions or income groups may be affected differently by faster planning decisions, additional housing supply, or any localised changes in housing availability and affordability.

Part B

Business environment

The scorecard summarises the IA's assessment that the proposal is expected to support the business environment. The wider IA explains that the two-tier NSD with a gateway test is expected to provide greater clarity, transparency and certainty about how LPAs scrutinise cases, supporting investors and applicants to make more informed decisions and benefit from a more streamlined delegation process.

This is a reasonable assessment. The scorecard would be strengthened by drawing more clearly on a proposal-specific assessment of possible impacts on competition, entry and investment in the development sector. It should explain whether reduced planning uncertainty is expected to affect smaller developers, new entrants or market concentration, and whether the benefits differ between large developers and SMB developers.

Trade and investment

The scorecard summarises the IA's assessment that there are no direct trade implications associated with modernising planning committees and that the streamlining of development processes is expected to be trade neutral. The wider IA notes that any indirect positive trade effect through greater demand for construction inputs is expected to be negligible.

The scorecard would be improved by clarifying whether any international investment impacts are expected through greater certainty for developers and investors, given that the wider IA's business environment discussion refers to investor confidence.

Natural capital and decarbonisation

The scorecard summarises the IA's assessment that there are no significant environmental or natural capital impacts directly related to the measure and that planning processes will continue to consider environmental matters. The wider IA notes that, where the measure results in additional housing, there may be embodied carbon impacts, but that the housing supply impact is expected to be small and uncertain.

This provides a reasonable qualitative assessment. The wider IA cites evidence on embodied carbon in UK construction but states that it does not have an established approach for estimating the scale of embodied carbon emissions from any additional development and therefore does not quantify the impact.

The scorecard would be strengthened by explaining more clearly why the expected housing-supply effect is small and by setting out whether any bounded assessment of embodied carbon would be proportionate, particularly if the proposal is intended to contribute to faster housing delivery.

Monitoring and evaluation

Monitoring and evaluation

The IA sets out a monitoring and evaluation plan. It states that planning committee changes will coincide with wider planning system reforms, and that process, impact and value-for-money evaluation have been committed to understand whether the Government's planning reforms have been delivered as intended and what impact they have on primary outcomes.

The IA states that a theory of change has been drafted for planning committees within the wider planning evaluation and that an outcomes framework will be developed. It also states that MHCLG will consider whether a standalone evaluation is required beyond the overarching planning evaluation.

The IA identifies relevant monitoring activity. LPAs will be required to keep records of cases delegated to officers and those referred to committee, including reasons for referral decisions, and to report this to the planning committee and publish it on their website. MHCLG will request returns on applications refused by committee and subsequently overturned at appeal.

The IA also includes a statutory review requirement. It states that the Government will undertake a review within two years of the implementation date and that the review will assess whether the Regulations are having the intended impact and consider possible changes to the NSD.

These elements provide a satisfactory basis for monitoring and evaluation. The department should specify the evaluation questions, baselines, metrics and data sources that will be used to assess changes in committee referrals, determination times, decisions against officer advice, appeals and outcomes for SMB developers. It should also set out how the evaluation will distinguish the effects of the NSD from concurrent planning reforms, including changes to the National Planning Policy Framework, housing targets and other planning-system measures. The evaluation should monitor unintended consequences, including the inappropriate delegation of applications that should receive committee consideration.

Data collection

The IA identifies several data sources and monitoring activities. These include LPA records of delegated and committee-referred cases, reasons for referral, data on applications refused by committee and overturned at appeal, planning application data and appeal data.

The IA states that national planning statistics will soon begin to record relevant data by individual LPA. It also states that LPAs will be required to keep records of cases considered for referral to committee and make them available.

The IA would be strengthened by presenting an outcomes framework setting out each metric, baseline, data source, collection frequency, owner and intended use. This should include both implementation metrics and outcome metrics.

The IA should also identify potential data-quality and access risks, including variation in how LPAs record reasons for referral, consistency of reporting on committee refusals, and the ability to link LPA referral data to appeal outcomes.

Post-implementation review

The IA includes a statutory review requirement and states that the review will be completed by 31 October 2028. This is within two years of implementation.

The statutory review will provide an early opportunity to assess implementation and emerging effects, but it may be too soon to assess some longer-term outcomes reliably. The department should therefore consider a later follow-up review, for example around five years after implementation, drawing on a longer run of evidence on appeals, determination times and the operation of the gateway test.

The review should assess whether the Regulations have met their objectives, whether the gateway test is operating as intended, whether the assumptions in the IA were reasonable, whether the impacts on SMBs were as expected, and whether any amendments to the NSD are required.

The IA would be strengthened by setting out the expected scope, ownership and key review questions for the statutory review. It should also identify triggers for earlier review, for example evidence of significant inconsistency in gateway-test application, unintended reductions in democratic oversight, material adverse impacts on particular application types, or significant divergence between expected and observed effects on appeals.

The statutory review should be designed to test whether the gateway test, referral behaviour, appeal reductions, determination-time savings and SMB impacts materialise as expected. This is particularly important because several of the appraisal assumptions are material to the estimated benefits and will depend on how LPAs apply the gateway test in practice.

Regulatory Policy Committee

For further information, please contact enquiries@rpc.gov.uk. Follow us on X @RPC_Gov_UK, LinkedIn or consult our website www.gov.uk/rpc. To keep informed and hear our views on live regulatory issues, subscribe to our blog.