

Planning Casework Unit,
Ministry of Housing, Communities and Local Government,
Third Floor,
Fry Building,
2 Marsham Street,
London,
SW1P 4DF

30th April 2026

Response submitted by email only to: pcu@communities.gov.uk

Dear Sir / Madam,

Re: Consulting the Secretary of State on Planning Decisions

Introduction

The Land, Planning and Development Federation (LPDF) welcomes the opportunity to respond to the current consultation on “Consulting the Secretary of State on Planning Decisions.” We recognise the importance of maintaining a clear, proportionate, and effective framework for referral and call-in decisions, particularly in the context of supporting sustainable economic growth and delivering much-needed development. In this regard, we particularly welcome the inclusion of commercial development within the scope of these proposals, reflecting its vital role in driving investment, employment, and wider economic activity.

This response is focused specifically on issues affecting commercial development. As such, the LPDF has limited its comments to Questions 1 and 2.

About the LPDF

The LPDF seeks to represent the UK’s leading land promoters, home builders and commercial developers. LPDF members support the housebuilding and commercial development sectors by promoting sites through the planning system, providing “shovel ready” land with a planning permission which can facilitate the delivery of infrastructure and serviced land parcels.

The LPDF seeks to actively engage with government on planning, housing and commercial development policy and to educate the wider public on the social, environmental and economic benefits of development through an evidenced based approach.

The LPDF encourages its members to deliver well designed, high quality, sustainable places which deliver a mix of housing types and tenures, commercial spaces and community uses that have a positive social, environmental, and economic impact.

Our key values include:

- Working in a positive and cooperative way with central and local government and key stakeholders, to deliver a planning system capable of supplying the homes and employment space we need.



- Promoting research and an evidence-led approach to policy development.
- Increasing the supply of new homes to meet demand and make home ownership a realistic possibility for all those who aspire to it.
- Ensuring that we build the affordable homes of all types and tenures that this country so desperately needs.
- Delivering new employment space to meet demand from businesses and support economic growth.
- Championing the impact of increased housing delivery on reducing intergenerational unfairness.
- Creating well designed, high quality and sustainable places to live and work.
- Educating and informing about the social, environmental and economic benefits of development.
- Supporting diversity of delivery in the market and championing SME developers.
- Promoting diversity and inclusivity within the sector.

Questions

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 LPDF supports the proposed consultation requirement for applications relating to large-scale, strategic commercial development where a Local Planning Authority (LPA) is minded to refuse permission. This approach is consistent with the recently introduced requirement for residential schemes exceeding 150 units, and it is appropriate that an equivalent mechanism applies to strategically significant commercial development.

However, while supportive in principle, the LPDF considers that the proposal would benefit from greater clarity and procedural certainty. In particular, there should be a clearer expectation regarding the timely progression of applications. As such, the LPDF recommends that the Government introduces a requirement for LPAs to indicate their position through a “minded to” statement either following pre-application engagement or within three months of a valid application being submitted.

Furthermore, where no decision or clear indication of intent has been made, the LPDF recommends that such applications are automatically referred to the Secretary of State after six months. This would help to avoid undue delay and ensure that strategically important development proposals are determined in a timely manner.

The LPDF considers that this type of approach should be applied consistently across sectors, including to the existing call-in direction for residential schemes of over 150 units.

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

The LPDF considers the proposed threshold of 15,000 sqm to be appropriate. A reduction in this threshold would likely bring a significantly larger number of applications within scope, potentially resulting in unintended delays to the planning process and, consequently, to the delivery of commercial development and wider economic growth.

The LPDF notes that, at the proposed threshold, schemes relating to industrial and logistics uses would be captured by this provision. Such developments are typically of a strategic nature and are therefore more likely to warrant consideration under this mechanism.



In this context, the LPDF believe it would be beneficial for the Government to clearly define the types of commercial development it intends to capture through this provision, and to assess whether the 15,000 sqm threshold effectively encompasses the majority of such schemes.

As currently drafted, the provision targets strategic, large-scale, out-of-town developments. The LPDF considers that the application of a call-in mechanism in these circumstances is appropriate and likely to be beneficial.

