

Nationally Significant Infrastructure Projects (NSIP) Reform team
Planning Infrastructure Division
Ministry of Housing, Communities and Local Government
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2 Marsham Street
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Response submitted via email only to: InfrastructurePlanning@communities.gov.uk

Dear Sir/Madam,

Re: Streamlining Infrastructure Planning

Introduction

Thank you for releasing the 'Streamlining Infrastructure' Working Paper.

The Land, Planning and Development Federation (LPDF) strongly support the government's drive to deliver significant economic growth and 1.5 million new homes during this Parliament, and it is encouraging that it has been recognised that delivering nationally important infrastructure is essential to ensure that this growth can be accommodated. There has been significant under investment by many of the UK's critical infrastructure providers which has led to capacity issues in areas such as water and electricity provision, waste water treatment, road and rail infrastructure, renewable energy and other areas which if not addressed, will seriously impact on the government's ability to meet its stated ambitions.

The Streamlining Infrastructure Working Paper is welcomed by the LPDF and its Members, as many of them have implementable planning permissions in place that are being held up by infrastructure capacity issues. As many more planning applications are anticipated to be delivered in the coming months following the government's positive changes to the planning system, these capacity issues are only going to get worse if the provision of new infrastructure is not speeded up and made less complex to deliver. Research by the LPDF, and quoted by the Prime Minister in his recent speech, suggests that the numbers of planning applications that are anticipated to be submitted between January and June 2025 will be a 160% increase on the numbers submitted between July and December 2024. In order to ensure that these applications are considered positively and in an expeditious manner, the government will need to do all it can to ease their path through the planning process and beyond to implementation, so that their ambitions can be realised.



As many of the questions contained within the Working Paper are of a technical nature around the NSIP process, the LPDF will not be responding to all of them in detail. There are other organisations that are better placed to comment upon these details. However, our comments focus on the more general issues regarding infrastructure provision which are faced by our members when trying to deliver new homes and commercial development.

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

(a) Would the package of measures being proposed in this paper support a more streamlined and modernised process? Are there any risks with this package taken as a whole or further legislative measures the government should consider?

(b) Are the proposed changes to NPSs the right approach and will this support greater policy certainty?

These two questions are answered together below.

The LPDF strongly support the government's drive for growth and we agree that it is the only way to increase the prosperity of our country and improve the living standards of working people. It is encouraging that the government have recognised that upgrading the country's economic infrastructure is critical to support this growth ambition, and sectors such as electricity generation, renewables, water suppliers and transportation are going to have to step up, invest and improve delivery, so that this growth ambition becomes a reality.

The government is right to highlight that there has been significant under-investment in electricity networks, rail and road infrastructure, water supply infrastructure and other key service areas such as education and social infrastructure, despite the investment plans of the infrastructure providers and the significant financial contributions that the development sector has made through the S106 and Community Infrastructure Levy (CIL) processes. Research by the Home Builders Federation (HBF) in 2024 highlighted the alarming fact that local authorities in England and Wales are estimated to be sitting on over £8 billion of infrastructure payments by developers, including over £6bn from Section 106 agreements and almost £2bn raised through the CIL¹. Along with the proposals to improve the efficiency of the NSIP process, the government also needs to review the implementation of the CIL process to potentially make it a mandatory requirement that all Local Planning Authorities (LPAs) have a CIL in place to support their local plan. This will ensure that the critical supporting infrastructure is delivered. The government also needs to ensure that LPAs, and other relevant bodies, are held to account to spend the S106 and CIL monies that are requested as part of development schemes.

The call for evidence for the New Homes Accelerator programme² identified systemic issues with the role of statutory consultees, and other organisations involved in the development process, infrastructure delivery, utilities provision and environmental factors. It is understood that MHCLG has begun to work with relevant bodies to further understand the causes of these issues and to consider any changes that can accelerate delivery. It is presumed that this Working Paper is part of that review process which is to be welcomed.

Many factors have caused the inefficiency of the infrastructure delivery process including the excessive evidence base requirements needed to support such schemes, the significant consultation processes which must be undertaken throughout a proposals life-cycle, the legal process which needs to be undertaken including any public inquiry to ensure that a scheme is acceptable and the potential for legal challenge throughout the process all of which lead to significant complexity, increased costs, increased risk and unacceptable timescales for the delivery of such projects. This process needs to be streamlined. The government has recognised the need for urgency in the delivery of

¹ [Unspent developer contributions](#)

² [New Homes Accelerator call for evidence: response - GOV.UK](#)



economic growth and new housing and this urgency must be reflected in the systems which lead to the delivery of critical national infrastructure.

The LPDF support the government's intention to prepare a 10-year Infrastructure Strategy as this will help to guide the delivery of nationally important strategic infrastructure as well as highlighting to all, the importance that the government is placing on delivering economic growth. This Infrastructure Strategy must align with the government's other long-term strategies such as the Industrial Strategy, Housing Strategy and Spatial Energy Plan so that there is a joined-up approach to the Country's investment strategies.

The LPDF also support the need to ensure that all National Policy Statements (NPSs) are updated and are reviewed at least once every five years, to ensure that they align with the government's growth agenda. These should be worded strongly so that all actors in the development process are clearly aware of the national importance placed on infrastructure delivery and the need to ensure that infrastructure capacity does not act as an inhibitor to growth.

Whilst the target of updating all NPSs by July 2025 is ambitious, it is critical that this target is achieved as the changes to the planning system will drive growth in the coming months which should not be held up by failing infrastructure capacity issues. It is also important, as the government has recognised, that there are clear and strong statements of intent from the government within these NPSs as these will give the certainty to investors, developers and communities as to what is expected.

It is also essential that the process for updating NPSs is simplified so that they can be updated quickly to reflect the government's changing priorities, and so that they can keep pace with ever changing technological advances and to meet ever tightening environmental standards.

Conclusion

The LPDF are strongly supportive of the government's drive for growth and our Members are stepping up to ensure that the government's ambitions are delivered. However, there are still many barriers to delivery which need to be addressed before a step change in delivery can be achieved. One of the key barriers to delivery, as the government has recognised, is infrastructure capacity and the LPDF are supportive of anything the government can do to ensure that the infrastructure providers are seen as development enablers, rather than them being a barrier to growth.

The performance of statutory consultees needs to be improved considerably through both the planning process and the delivery of nationally important infrastructure. Response times to planning applications from statutory consultees needs to be improved considerably to ensure that planning applications have an efficient path through the system, and their requests for contributions need to be realistic, consistent and justified to ensure that they do not jeopardise the viability of development.

The preparation of longer-term national strategies by the government is strongly supported so as to set the national priorities which all actors in the development process must ensure they deliver. It is critical that all of these strategies align with each other, align with the changes being made to the planning system, and are consistent with the government's overall ambitions.

The LPDF would push for its long-term request for the preparation of a National Plan. The UK is one of the only countries without a National Plan and this would be an opportunity for the government to set out in a single document, the national priorities which we should all be striving to achieve.



I hope that this general response is helpful, and if MHCLG require further discussion on any of the issues raised then please do not hesitate to contact me.

Yours sincerely.



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