

27 October 2025

Streamlining Infrastructure Planning Consultation
Planning – Infrastructure Division
Ministry of Housing, Communities and Local Government
Third Floor SE, Fry Building
2 Marsham Street
London
SW1P 4DF

Dear Sir/Madam,

[Re. Ministry of Housing, Communities & Local Government - Consultation on streamlining infrastructure planning](#)

The Civil Engineering Contractors Association (CECA) welcomes the opportunity to respond to the above-mentioned review.

CECA is the representative body for companies who work day-to-day to deliver, upgrade, and maintain the country's infrastructure. With more than 300 members based across six English regions and the devolved nations of Scotland and Wales, CECA represents firms who together carry out an estimated 70-80 per cent of all civil engineering activity in the UK, in the key sectors of transport, energy, communications, waste and water. Our members deliver work worth an estimated £30 billion to the economy every year.

Our members' ability to price, programme and mobilise national infrastructure depends critically on a planning system that is predictable, proportionate and timely. And yet the UK Government's own evidence shows that the timespan for Development Consent Orders (DCOs) increased from 2.6 years to 4.2 years between 2012 and 2021, with extensions to the statutory stages of the Nationally Significant Infrastructure Project process being most evident in highways and offshore wind-related developments.

These delays not only push delivery costs and risk-price for contractors but hamper the multiplier effect of infrastructure investment in the wider economy. Our research shows that for every £1 invested in infrastructure £2.84 in total economic activity is generated. The UK's costly and onerous system for delivering major infrastructure projects is actively holding back our economy, to the detriment of communities and businesses.

CECA believes there are clear steps that can be taken to streamline infrastructure planning, reduce volumes of documentation, minimise duplication through digitisation, and ameliorate litigation risk. Reforms must focus on earlier clarity, disciplined scope, accountable inputs from public bodies, and digital-by-default processes with inclusive safeguards.

Specifically, we recommend:

- **The use of non-statutory Engagement Statements for NSIPs that set out who was engaged, issues raised, how proposals evolved, and residual points of disagreement.**
- **That guidance should request that examining authorities publish a short 'IAP1 routemap' at the recommendation stage, which maps how each principal issue influenced the time-table, engagement undertaken in reference to each, and actions arising.**
- **Government should consider piloting specific schemes through the fast-track process with published after-action reviews to identify what works and to learn lessons, as well as engaging with projects that have decided not to pursue the fast-track option.**

- **Government should commit to a study of global planning processes in conjunction with its legislative activities, so that examples of international best practice can be fed into to future UK infrastructure policy on a rolling basis.**

We have commented below where we feel as an organisation we have something substantial to contribute to this consultation. We look forward to working with you over the coming months.

Yours sincerely,



Ben Goodwin
Director of Policy & Public Affairs
Civil Engineering Contractors Association (CECA)
E: bengoodwin@ceca.co.uk
Tel. 07398479306
www.ceca.co.uk

27 October 2025

Consultation Response

CECA Consultation Response:

Streamlining infrastructure planning

Introduction

CECA strongly supports the UK Government's objective to speed up and de-risk the development consent regime for Nationally Significant Infrastructure Projects (NSIPs) while maintaining quality, fairness, and environmental safeguards. A streamlined, predictable infrastructure planning regime is essential to meeting the UK's growth, resilience, and net zero objectives.

Chapter 1: Pre-Application

Headline Question

Question 1: Please provide views about the potential risks and benefits of government producing more prescriptive or less prescriptive guidance about pre-application consultation and engagement in absence of statutory requirements. In particular, we are interested in views on how guidance on engagement can support an efficient, faster, proportionate and effective NSIP process or whether doing so risks undermining the potential time and cost savings.

CECA strongly supports removing statutory pre-application provided guidance secures early, proportionate, and meaningful engagement with communities, local authorities, statutory bodies, interested parties, and other relevant stakeholders.

Guidance should be outcome-focussed, aimed at highlighting the issues that determine acceptance readiness and that will inform the Initial Assessment of Principal Issues (IAP), rather than prescribing set rounds or volumes of activity. To this end we recommend that guidance should make clear that engagement should be proportionate to a project's footprint and sensitivity, with indicative expectations outlined by context.

Guidance that promotes the identification of potential issues at an early stage will reduce claims downstream in the process and minimise the reiteration of engagement and associated costs in time and resource. It should therefore emphasise the need for outcome-focussed engagement that aims to interrogate potential issues of relevance to the acceptance process, provide clear guidelines for how stakeholders can input their views, and set reasonable time-scales for issues to be raised.

CECA advocates the recommendation of a **non-statutory Engagement Statement** that sets out who was engaged, issues raised, how proposals evolved, and residual points of disagreement. This would minimise pre-application drift and obviate the need for multiple rounds of consultation or onerous documentation requirements. Best-practice guidance should establish clear minimums on who must be engaged, and when. To lock in time and cost savings Government should cap the length of Engagement Statements through the provision of templates/page limits/word limits, as appropriate.

We favour a digital-by-default approach to notification and publicity, coupled with assisted access for those who need it. A single canonical project website with summaries written in clear language that sets out clear priorities, time-frames, and accurately identifies points of contact will improve the speed and transparency of the process without excluding interested parties.

A project-specific website, with a minimum online availability period, should act as a 'one-stop-shop' that provides interested parties with an audit trail of the application process while also setting out the benefits projects will bring in the short, medium, and longer term to communities in which they are built. Emphasis should be placed on representativeness, accessibility, and accuracy of information over volume of documentation or technical detail. Project websites should also utilise video and infographics in demonstrating the benefits brought by project delivery as appropriate, should include Welsh-language (or other language) provision where relevant, and conform to best-practice accessibility requirements.

Chapter 2: Acceptance

Question 22: What further advice is needed through guidance to ensure sufficient clarity about the test that will be applied by the Planning Inspectorate at the acceptance stage, and how applications can be prepared that will meet the acceptance test? What guidance if any should be provided to provide clarity about matters that are not tested at acceptance, in order to clearly establish the difference between past and future requirements?

CECA supports the decision of the Government to alter the words in the acceptance test from an application being 'of a satisfactory standard' to one which is 'suitable to proceed to examination' via the Planning and Infrastructure Bill. Re-framing acceptance around whether an application is of sufficient quality to proceed to application will expedite the acceptance process and in time provide real-world examples of successful applications. To these ends, guidance should include clear examples of best practice and identify potential pitfalls based on past experience.

The Planning Inspectorate's ability to request corrective action by applications so that applications may be accepted within a 28 day period will expedite the acceptance process on the basis of a 'presumption to proceed' but the Inspectorate must be explicit in setting out its expectations and whether those expectations have been met within a suitable timeframe of receipt.

Guidance in this case should provide applicants with an annotated acceptance checklist that should emphasise that acceptance is not an assessment of whether issues are resolved, but of whether the information submitted is sufficiently coherent and comprehensive to allow for examination within statutory time-frames.

Guidance should distinguish between fundamental information gaps, such as survey and baseline deficits that cannot be rectified in time for examination, and issues that are clearly resolvable within a given time-frame. Guidance should explicitly discourage iterative, multi-round requests for correction, revision, or addition to applications, and should confirm that where an addressable issue is resolved within the given time-frame this does not re-set the acceptance time-table.

Clarity as to what is and is not tested at the acceptance stage should be informed by a commitment by the Planning Inspectorate to publish short, consistent acceptance documentation regarding requests for corrective action and how corrective action has been undertaken. In addition, applicants should be encouraged to publish a short outline of potential issues for the examination using a provided template prior to submission.

Chapter 3: Pre-examination and Examination

Question 24: What further steps should government consider to strengthen the role of the Initial Assessment of Principal Issues (IAPI), so that it supports early clarity for all stakeholders, procedural fairness, and a more focused and effective examination?

CECA is in favour of a pre-examination and examination process that is streamlined by making Initial Assessments of Principal Issues (IAPIs) standard practice. IAPIs should be focussed on decision-critical matters, list critical issues and identified evidence bases, and be published within a reasonable time-frame of acceptance (such as a 28 day window) using a pre-written template and/or word and page limits.

Guidance for participating public bodies should set expected service levels (such as a response window of 20 working days to written questions), named case leads, and recommend the assignation of responsibilities for maintaining evidential standards and the continuing accuracy of information provided over time. Emphasis must be placed on the establishment of realistic deadlines and matching resource to requirements, so that expectations are deliverable and the ownership of project undertakings is future-proofed against changes in personnel in named case leads.

CECA recommends that guidance should request that examining authorities publish a short 'IAPI routemap' at the recommendation stage, which maps how each principal issue influenced the time-table, engagement undertaken in reference to each, and actions arising; this transparency will build confidence that examinations are issue-led, that stakeholders are able to engage in the process, and that decisions arising are robust as they are based on clearly identified priorities and focussed problem-solving.

Chapter 4: Reforming NSIP Services

Question 44: The current fast-track guidance is designed to deliver upfront certainty for making decisions within 12 months of applications being accepted. Do you consider it fit for purpose? If not, please give reasons.

CECA is a strong supporter of the Government's priority in providing a strong strategic direction to infrastructure planning and delivery, as evidenced in the creation of the National Infrastructure and Service Transformation Authority (NISTA) and publication of the Government's 10 Year Infrastructure Plan.

We welcome the direction to refocus the Planning Inspectorate's pre-application services to put local authority engagement on a sustainable footing, and to re-design the fast-track so it is genuinely usable. However we note that there has been limited take-up of the fast-track route since its introduction. We believe there should be a clearer role for Government in prioritising projects against transparent criteria in order to fast-track them towards delivery, and that industry has a role in identifying blockers to specific projects over the course of the planning process.

The limited up-take to date would imply that the fast-track route is not currently fulfilling its intention in progressing schemes to market. We believe the Government should consider piloting specific schemes through the fast-track process with published after-action reviews to identify what works and to learn lessons, as well as engaging with projects that have decided not to pursue the fast-track option, but would have been likely candidates for progression, to identify and remove blockers to this route.

Conclusion

CECA members share the Government's ambitions to deliver more, faster, and better. We believe that the recommendations above, if implemented, will materially improve market certainty, reduce costs, and compress delivery time-lines, without undermining scrutiny, democratic accountability, or environmental outcomes.

The delivery of nationally-significant infrastructure in the UK has historically suffered from a lack of long-term strategy and it is to be welcomed that the Government is taking steps to address the fact that it costs more, and takes longer, to build vital infrastructure in the UK.

Streamlining the UK's onerous planning system in order to speed up projects will boost growth and improve the quality of life of communities across England, Scotland and Wales. We believe the UK Government should continue to work closely with industry in order to identify the blockers to growth, expedite project delivery, and tackle the inertia that exists in moving projects from conception to site.

Reforming infrastructure planning based on clarity, accountability, and deliverability, with a focus on economic growth as the key determining driver within existing environmental guidelines, will provide better outcomes for our businesses and communities. Nonetheless, it should be noted that infrastructure development in comparable economies to the UK faces fewer obstacles and is delivered on shorter time-scales.

As such, we believe the Government should commit to a study of global planning processes in conjunction with its legislative activities, so that examples of international best practice can be fed into to future UK infrastructure policy on a rolling basis.

CECA stands ready to work with Government, our members, industry partners, and other stakeholders, to test proposed guidance, provide industry feedback on proposed changes, and share lessons from live projects.