

9 March 2026

Planning Policy Consultation Team,  
Planning Directorate – Planning Policy Division,  
Ministry of Housing, Communities and Local Government,  
Floor 3, Fry Building,  
2 Marsham Street,  
London,  
SW1P 4DF

Dear Sir/Madam,

[Re. National Planning Policy Framework: proposed reforms and other changes to the planning system - consultation](#)

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

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. Together, our members deliver work worth an estimated c. £30bn per annum to the UK economy.

We have commented below where we feel as an organisation we have something substantial to contribute to this consultation, and are keen to work with the Government in any capacity you deem might be useful in this important ongoing work.

Furthermore, should you or your colleagues like to discuss the National Planning Policy Framework with CECA members who represent the contracting organisations that deliver the UK's infrastructure, we would be delighted to facilitate this as appropriate.

Best wishes,



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Director of Policy & Public Affairs  
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# Consultation Response

CECA Consultation Response:

## National Planning Policy Framework: proposed reforms and other changes to the planning system

### Introduction

The Civil Engineering Contractors Association (CECA) welcomes the opportunity to respond to the consultation on proposed reforms to the National Planning Policy Framework and related changes to the planning system (England).

CECA represents the businesses who deliver, maintain, and upgrade the UK's economic and social infrastructure across transport, energy, communications, waste and water. Our members' ability to price, programme and mobilise depends critically on a planning system that is predictable, proportionate and timely. CECA's evidence base on streamlining approvals consistently emphasises earlier clarity, disciplined scope, accountable inputs from public bodies, and digital-by-default processes with inclusive safeguards.

Across the draft reforms, our response is based on an assessment as to whether the changes increase certainty and consistency, reducing the need for duplication of engagement and negotiation churn; support the timely delivery of vital infrastructure schemes; and reduce avoidable delays in the planning process by standardising information requirements and improving the accountability and responsiveness of statutory and public bodies.

UK infrastructure projects cost significantly more than equivalent schemes delivered in most of the world. The time and resource spent during pre-construction slows economic growth in the UK, and our economy is hamstrung by a system that incentivises the over-mitigation of potential objections to planning decisions.

For the UK to transition to a market-leader in infrastructure provision and for the economy to feel the full impact of economic growth driven by infrastructure schemes, the planning system must be reformed to adopt a presumption in favour of delivering economic growth, streamlining decision-making, and identifying and removing drivers of inertia at all points in the system.

CECA strongly supports the direction of travel towards a clearer, more rules-based national policy framework, and changes that will allow our members to deliver the world-class infrastructure that the UK needs in the 21st century.

Specifically, CECA recommends:

- **Making the rules clear and consistent nationwide: national policy must be genuinely rules-based, and the hierarchy of decision-making authority must be unambiguous so that national decision-making is not relitigated or refracted through local policymaking.**
- **Reducing onerous documentation & evidence demands - Evidence requirements must be standardised, streamlined using templates and defined maximum/minimum datasets, and based on guidance that establishes criteria as to what is fit for purpose.**
- **Ensure public bodies respond on time - a reformed National Planning Policy Framework must be paired with timetabling, clear expectation for timely consultee responses, and clear escalation routes where delays do occur.**
- **Link Growth Plans to real-world infrastructure delivery - deliverability and sequencing must be hard-wired into strategic and local planning, with greater use of Early Contractor Involvement (ECI) and the inclusion of an infrastructure delivery statement in local plans and spatial strategies.**

- **Minimise late-stage negotiations & the re-opening of decisions – clarify review mechanisms so they manage genuine change without reopening settled positions and reduce negotiation churn.**
- **Ensure standards are based on real-world practicability - National standards should come with clear approval / adoption responsibilities and time-limited processes, and planning should not duplicate other regulatory regimes.**

## **CECA RESPONSE TO SELECTED QUESTIONS**

*Please note CECA has responded to a selection of the questions on the topics we deem most relevant to infrastructure delivery, system operability, and reducing avoidable delay.*

### **1). Do you have any views on how statutory National Development Management Policies could be introduced in the most effective manner, should a future decision be made to progress these?**

CECA supports the objective of improving consistency and certainty. Should the Government opt to bring National Development Management Policies (NDMPs) into force, due consideration must be given to ensuring that their position within the hierarchy of planning decision-making is unambiguous in relation to all other local plans and spatial development strategies.

The effectiveness of NDMPs will hinge on their functioning as a clearly defined source of legitimate (and final) decision-making and steps must be taken to ensure disciplined scope, to avoid unwanted variations in how the system operates through informal practice, uneven interpretation, or inconsistency arising from local planning. If a decision is taken to proceed NDMPs should be introduced with a clear statement of precedence and conflict resolution, controlled versioning, and a stable update cadence to support investment confidence.

Furthermore, an explicit national baseline for validation and submission requirements should include clearly defined parameters for additions based on local circumstance. CECA believes that predictability and standardisation will reduce burdens on businesses, avoid drift, and will support efficient delivery, but for the system to operate effectively there must be no scope for conflicting interpretation within the decision-making hierarchy.

### **2). Do you agree with the new format and structure of the draft Framework which comprises separate plan-making policies and national decision-making policies?**

CECA Response: Partly agree.

CECA believes the proposed new format and structure of the Framework will improve clarity and reduce duplication, provided that the Framework provides a practical 'map' for users, and if plan-making expectations do not re-introduce divergence through inconsistent evidence demands or varying local standards.

CECA recommends that an accompanying note should be published highlighting how to apply policies in sequence; how to handle transitional cases; and what 'good' looks like in terms of proportionate evidence and decision-making timetables. Users require a clear hierarchy of rules where plan-making and national decision-making policies pull in different directions, and clear guidelines on how decision-makers should resolve conflict.

CECA believes that structure alone won't speed decisions if statutory/public body inputs remain a bottleneck. The new structure should therefore be accompanied by clear expectations for timely, accountable inputs and timetabling.

### **3). Do you agree with the proposed set of annexes to be incorporated into the draft Framework?**

CECA Response: Strongly agree.

CECA strongly supports importing 'operability-critical' material into annexes, where it reduces fragmentation and dispute about what is required and where it will avoid local divergence. We believe that annexes should remain manageable, accessible, and useable. To avoid annexes from becoming a new source of documentation bloat, Government should provide clear templates and word limits, as well as definite minimum and maximums for datasets.

### **4). Do you agree with incorporating Planning Policy for Traveller Sites within the draft Framework?**

CECA Response: Agree.

CECA supports consolidating planning policy where it improves consistency and reduces fragmentation. Incorporation should, however, be accompanied by clear expectations on proportionate evidence, validation requirements, and timetabling to avoid delay arising from inconsistent local interpretation.

Where traveller site policy interacts with infrastructure constraints (e.g. highways access, utilities, flood risk, water and wastewater capacity), CECA recommends that the Framework is explicit that information requests must be necessary and proportionate, and that statutory and public body inputs should be timely and accountable. This will help avoid avoidable churn and prevent applications being stalled by open-ended requests for additional material.

**5). Do you agree with the proposed approach to simplifying the terminology in the Framework where weight is intended to be applied?**

CECA Response: Agree.

CECA believes simplification that supports clarity will invariably lead to better outcomes. At the same time we note that 'weight' terminology alone will not deliver faster outcomes unless paired with more consistent information requirements and more accountable inputs from public bodies (including timely statutory responses), which are a key source of drift.

**6). Do you agree with the role, purpose and content of spatial development strategies set out in policy PM1?**

CECA Response: Agree

CECA supports strategic planning that better aligns growth with infrastructure capacity and delivery phasing. Spatial development strategies can reduce later conflict where they provide credible, deliverable infrastructure pathways, including dependencies and realistic timetables.

CECA recommends that spatial strategies include an 'infrastructure delivery statement' setting out priority schemes, dependencies, indicative funding routes and phasing assumptions, so that growth allocations and infrastructure provision remain aligned over time. This alignment should be further based on Early Contractor Involvement (ECI) in relevant aspects of planning and establish ECI as best practice rather than a 'nice to have.'

**7). Do you agree that alterations should be made to spatial development strategies at least every 5 years to reflect any changes to housing requirements for the local planning authorities in the strategy area?**

CECA Response: Partially agree.

CECA supports five-year review cycles in principle but notes that the frequent re-opening of strategic positions can undermine investor confidence. For alterations to be made to spatial development strategies on a five-year basis, clear thresholds for alteration should be in place based on empirical evidence, and an indicative timetable for assessing these thresholds and making alterations should be provided to prevent this process from unduly slowing delivery.

**8). Do you agree with the role, purpose and content of local plans set out in policy PM2?**

CECA Response: Agree.

CECA supports strengthening the role of local plans as a delivery-focused instrument that provides certainty to investors and supply chains. In CECA's view, local plans should not only allocate land, but also set out credible delivery pathways, including infrastructure dependencies, constraints, and indicative phasing assumptions. On major allocations, earlier engagement through Early Contractor Involvement (ECI) can help ensure those dependencies and lead times are realistic from the outset, reducing later redesign, repeated information requests, and delay.

CECA recommends that local plans include a practical 'infrastructure delivery and dependencies statement' that links growth allocations to enabling works, network reinforcement, utilities constraints, statutory approvals, and realistic lead times. This will reduce later conflict, improve deliverability, and enable earlier mobilisation across the supply chain.

**10). Do you think that local plans should cover a period of at least 15 years from the point of adoption of the plan?**

CECA Response: Yes.

CECA believes that clear plan scope and adequate time horizons are essential. CECA supports plans covering at least 15 years, provided the approach enables a stable pipeline and reduces stop-start uncertainty. Stability of pipeline and investor confidence is vital to successful infrastructure delivery, and major schemes often require long-term windows in which to be built successfully.

For local plans to operate successfully over a 15-year window suitable means of assessment of 'milestones' during the plan should be put in place, with a view to affording flexibility of resource allocation, but without creating a 'stop-start' delivery of plans over time. In addition, due attention should be paid to ensuring the continuity of delivery of plans over a timeframe that will normally exceed the continuity of personnel involved in its delivery.

**11). Do you agree with the principles set out in policy PM6(1c), including its provisions for preventing duplication of national decision-making policies?**

CECA Response: Strongly agree.

CECA strongly supports preventing duplication, as duplicated policy tests are a major source of inconsistent practice, delay, and risk pricing. PM6(1c) should be reinforced through clear guidance for plan-makers and examiners on avoiding 'gold plating' of national decision-making policies through local evidence burdens, bespoke standards, and parallel assessment frameworks.

CECA recommends that Government sets a clear expectation that where national decision-making policies apply, local plan policy should not replicate them unless there is a demonstrable and narrow local justification.

**12). Do you agree with the approach to initiating plan-making in PM7?**

CECA Response: Agree.

CECA supports reforms that encourage earlier clarity on scope, evidence requirements, and sequencing. PM7 should be implemented with clear expectations on timetables and disciplined scoping to avoid plans becoming open-ended, over-evidenced, and slow to adopt. CECA recommends a clear 'front-loaded' gateway stage: agreed evidence scope, a published plan timetable, and a default set of national datasets to reduce bespoke requests. This would improve predictability and reduce delay.

**13). Do you agree with the approach to the preparation of plan evidence set out in policy PM8?**

CECA Response: Agree.

CECA supports proportionate evidence that is focused on what is necessary to make decisions and unlock delivery. The principal risk is that PM8 becomes interpreted as an enabler of excessive evidence demands, particularly where risk aversion and a fear of legal challenge drive over-mitigation.

CECA recommend that a clearer national baseline be established for evidence expectations, including standard templates and datasets. This should be backed-up by explicit guidance setting out parameters by which evidence must be fit for purpose and time-limited, rather than exhaustive. A more rigorous expectation that statutory consultees and public bodies provide timely, accountable inputs to evidence preparation, with timetabling and escalation where delays occur, will reduce avoidable pre-construction drag and help stabilise delivery pipelines.

**14). Do you agree with the approach to identifying land for development in PM9?**

CECA Response: Partially agree.

CECA supports a clearer, more deliverability-led approach to land identification. However, land allocation can create false certainty if infrastructure dependencies and network capacity constraints are not addressed early. We believe there is scope to strengthen PM9 to future-proof major allocations – covering enabling works, utilities reinforcement, water and wastewater capacity, highways provision, and statutory approval lead times – in order to reduce later renegotiation and attendant delays, and to facilitate optimal sequencing of infrastructure delivery.

**15). Do you agree with the policies on maintaining and demonstrating cross-boundary cooperation set out in policy PM10 and policy PM11?**

CECA Response: Agree.

CECA supports effective cross-boundary cooperation as a prerequisite for coherent infrastructure delivery, particularly where growth relies on strategic transport, energy, and water networks that may not align with or cross local authority boundaries. CECA recommends that PM10/PM11 are supported by clearer mechanisms to secure timely engagement and resolution, including shared infrastructure dependencies across neighbouring authorities, and clear expectations for statutory consultees and infrastructure providers to engage within agreed timescales. Where cross-boundary issues are identified as having the potential to stall plan progression, escalation and resolution routes should be straightforward and accessible.

**16). Do you agree that policy PM12 increases certainty at plan-making stage regarding the contributions expected from development proposals?**

CECA Response: Agree.

CECA strongly supports greater certainty on contributions at plan-making stage, as late-stage negotiation is a major driver of programme delay and cost escalation. CECA recommends that PM12 is aligned with a standardised national approach to contribution assumptions, including clearer expectations on what should be fixed at plan stage, what can flex (and why), and how review mechanisms should operate without creating open-ended renegotiation. Certainty at plan stage should also be paired with improved timeliness and accountability from public bodies responsible for approvals and technical inputs, to prevent delays being displaced rather than resolved.

**17). Do you agree that plans should set out the circumstances in which review mechanisms will be used, or should national policy set clearer expectations?**

CECA Response: National policy should set clearer expectations.

CECA supports review mechanisms where they are narrowly defined, proportionate, and triggered by changes in on-the-ground circumstance. However, overly permissive review expectations risk reintroducing churn and undermining investor confidence, particularly for long-lead infrastructure schemes and major sites. CECA recommends that national policy sets clearer, tighter triggers for review, and provides guidance to ensure reviews do not become a routine reopening of settled assumptions. Reviews should be used to manage genuine change, not to extend negotiation or delay delivery.

**18). Do you agree with policy PM13 on setting local standards, including the proposal to commence s.43 of the Deregulation Act 2015?**

CECA Response: Agree with safeguards.

CECA supports reforms that prevent inconsistent local standards becoming a barrier to delivery. Divergent local requirements can impose significant cost and administrative burden on contractors and clients, particularly where evidence demands and bespoke standards vary across adjacent authorities.

CECA recommends that, where local standards are permitted, they must be justified against clear national criteria, subject to proportionality, and time-limited to avoid accumulation of outdated requirements. Implementation should also include transitional clarity to avoid uncertainty for schemes already in the pipeline.

**19). Do you agree that the tests of soundness set out in policies PM14 and PM15 will allow for a proportionate assessment of spatial development strategies, local plans and minerals and waste plans at examination?**

CECA Response: Agree.

CECA supports a more proportionate approach to examination, focused on deliverability and clarity rather than unattainable or unrealistic model standards. The examination process should reinforce disciplined scope and avoid rewarding over-evidencing or speculative mitigation.

CECA recommends examiner guidance that prioritises deliverability, clear infrastructure sequencing, proportional evidence, and realistic timetables for implementation.

**41). Do you agree with the policy DM2 on information requirements for planning applications?**

CECA Response: Strongly agree with intent.

CECA supports clearer and more standardised information requirements, as inconsistency in validation and submission requirements is a major cause of delay, cost, and duplication. Predictability is essential to enabling efficient mobilisation and procurement.

DM2 should be accompanied by a clear national baseline for validation requirements, strict limits on discretionary additions, and guidance on when additional information is genuinely necessary. This should be paired with digital-by-default processes and clear timeframes for statutory and public body responses.

**43). Do you have any views on whether such a policy could be better implemented through regulations?**

CECA Response: Yes.

CECA believes regulations are likely to be the most effective route for achieving consistency and enforceability. A regulatory baseline would reduce local divergence, limit scope creep, and provide clearer grounds for challenge where disproportionate requirements are imposed. If the policy is implemented through regulations, CECA recommends the deployment of defined minimum/maximum datasets, templates that are utilised on a consistent (national) basis, and transparent exceptions for genuinely site-specific constraints.

**46). Do you agree that policy DM5 would prevent unnecessary negotiation of developer contributions, whilst also providing sufficient flexibility for development to proceed?**

CECA Response: Agree with intent, subject to operability.

CECA supports reducing negotiation churn and improving certainty. However, flexibility must be meaningful where viability or deliverability is constrained by infrastructure lead times, utilities reinforcement, statutory approvals, or public body capacity. Policy should explicitly avoid penalising delivery for constraints outside developers' control, and should encourage aligned sequencing between contributions, infrastructure approvals, and delivery timetables.

**48). Do you have any further comments on the likely impact of policy DM5: Development viability?**

CECA Response: Yes.

CECA's view is that viability debate frequently becomes a proxy for uncertainty elsewhere in the system. Where infrastructure requirements, statutory body inputs, or information expectations are unstable, risk pricing increases and negotiations extend in duration. CECA recommends that DM5 is paired with clearer national assumptions for common cost inputs and infrastructure dependencies, stronger discipline on evidence and information requirements, and clearer accountability for timely public body inputs. This would reduce both viability disputes and programme delay.

**54). Do you agree that policy DM7 clarifies the relationship between planning decisions and other regulatory regimes?**

CECA Response: Strongly agree.

CECA supports a clearer separation of planning considerations from other regulatory regimes to reduce duplication, conflicting requirements, and delay. CECA recommends that DM7 is strengthened to emphasise that planning should not be used to re-litigate matters that are properly controlled through other consenting and regulatory frameworks, and that statutory bodies should coordinate inputs to avoid contradictory requirements.

**101). Do you agree with the approach to planning for energy and water infrastructure in policy W1?**

CECA Response: Strongly agree.

CECA supports stronger policy support for energy and water infrastructure, reflecting the scale and urgency of national need. The key delivery risk is not policy intent but the operational reality of consenting timetables, statutory inputs, and network constraints.

CECA recommends that W1 is supported by clearer expectations for timely engagement and decision-making by statutory bodies and infrastructure providers, and clearer guidance on proportionate evidence requirements to avoid delay.

**102). Do you agree with the amendments to current Framework policy on planning for renewable and low-carbon energy development and electricity network infrastructure in policy W2?**

CECA Response: Strongly agree.

CECA supports clearer national policy support for renewables and network infrastructure, including grid reinforcement and enabling works. To accelerate delivery, policy should provide confidence that essential reinforcement and enabling works will be treated as integral to energy projects, with clear and proportionate information requirements and time-limited consultation inputs.

**103). Do you agree with the proposed approach to supporting development for renewable and low carbon development and electricity network infrastructure in policy W3?**

CECA Response: Strongly agree with implementation safeguards.

CECA supports a more delivery-focused approach. In practice, the most common causes of delay are sequencing constraints (land, access, network reinforcement), and prolonged pre-application engagement driven by inconsistent evidence demands. CECA recommends that W3 is accompanied by guidance on proportionality and sequencing, including clearer expectations on the interaction between planning, grid connection processes, and other consents.

**104). Do you agree with the proposed approach to supporting development for water infrastructure in policy W4?**

CECA Response: Strongly agree.

CECA supports stronger national policy for water and wastewater infrastructure, including treatment capacity and network upgrades, reflecting the role of water constraints in slowing housing and industrial delivery. We recommend a clearer expectation that water and wastewater capacity constraints are addressed early at plan stage, with delivery timetables and accountable inputs from statutory bodies and infrastructure providers.

**118). Do you agree with the proposed requirement in policy F8 for sustainable drainage systems to be designed in accordance with the National Standards?**

CECA Response: Agree.

CECA supports national consistency for SuDS standards. To avoid unintended delay, implementation must ensure that standards are clear, that approval and adoption responsibilities are well-defined, and that adopting bodies are appropriately resourced.

CECA recommends that guidance makes clear maintenance responsibilities and adoption pathways, and that the approvals process is time-limited to avoid SuDS becoming a source of extended pre-commencement delay.

**132). Do you agree that the amended wording proposed in policy TR6 provides a clearer basis for identifying when transport assessments and travel plans are required, and how development proposals should be assessed in terms of their impacts on the transport network?**

CECA Response: Agree.

Transport assessment requirements should be proportionate and risk-based, with clear thresholds and standardised scope to avoid repeated bespoke modelling and prolonged negotiation. CECA recommends that TR6 is supported by clear templates for assessment scope, a consistent approach across authorities, and time-limited responses from highway authorities and relevant bodies to reduce uncertainty and delay.

**140). Do you agree criteria b) of policy M2 strikes the right balance between preventing minerals sterilisation and facilitating non-minerals development?**

CECA Response: Agree.

CECA supports safeguarding minerals resources and preventing sterilisation, given the central role of aggregates and construction materials in infrastructure delivery. Policy should ensure that minerals safeguarding is applied consistently and proportionately, avoiding late surprises that delay schemes. CECA recommends clearer guidance on when prior extraction is appropriate, and on proportionate assessment requirements to avoid unnecessary delay while protecting supply.

**150). Do you agree that the proposed approach to planning for the natural environment in policy N1, including the proposed approach to biodiversity net gain, strikes the right balance between consistency, viability, deliverability, and supporting nature recovery?**

CECA Response: Agree with intent, subject to operability and proportionality.

CECA supports nature recovery objectives and a consistent national approach. However, policy must be implemented in a way that is deliverable and does not introduce avoidable delay through unclear evidence expectations, inconsistent local interpretation, or slow statutory inputs. We believe that clearer guidance on proportionality, on how BNG expectations interact with other regimes and delivery plans, and on the availability and operability of off-site solutions will lead to improved outcomes.

**176). Do you agree with the transitional arrangements approach to decision-making?**

CECA Response: Agree with intent, but clarity is essential.

CECA supports transitional arrangements that provide certainty and avoid arbitrary reopening of settled positions. Transitional provisions should be clear, easy to apply, and designed to reduce delay rather than shift risk and uncertainty into the pipeline.

CECA recommends that transitional rules are accompanied by practical guidance that clarifies how in train plans and applications will be treated, and that ensures decision-making remains timely and predictable during the transition period.

**193). Do you have any further thoughts on the policies outlined in this consultation?**

CECA Response: Yes.

Across the proposed reforms, CECA's priority is to ensure that the system becomes faster, more predictable, and more consistent. Policy structure and wording changes will not realise their full benefit unless paired with:

- Standardised national information requirements with disciplined limits on local additions;
- Time-limited, accountable inputs from statutory and public bodies, with transparent timetabling and escalation routes where delays occur;
- Stronger emphasis on deliverability, sequencing, and dependencies at plan stage, so infrastructure and growth are aligned, and programme risk is reduced.

CECA stands ready to support the Government with further evidence on where delay, duplication, and negotiation churn arise, and how reforms can be implemented to unlock faster delivery and better value for clients and the taxpayer.

## **Conclusion**

CECA supports the overall direction of reform toward a clearer, more operable, more rules-based national policy framework - particularly where it strengthens planning for energy, water, transport and flood resilience, and where it reduces fragmentation and inconsistency.

However, we strongly believe that delivery benefits will depend on practical operability, standardised minimum information requirements, disciplined scoping that obviates the potential for onerous iterative demands, and accountability and transparency on the part of public bodies.

This is consistent with CECA's established positions on streamlining approvals, reducing burdens on businesses (such as onerous or re-iterative documentation requirements) and improving certainty for industry, our clients, and investors. We stand ready to work with government, clients, industry partners, and other stakeholders to test guidance, provide feedback based on real-world practicability, and support implementation that achieves better outcomes, without undermining democratic accountability or environmental safeguards.

CECA strongly believes that if the UK gets this right, we can transition to a regime that prioritises economic growth, changes lives for the better, and delivers transformational outcomes for businesses and communities across the country.