

Ministry of Housing, Communities and Local Government
Consultation on streamlining infrastructure planning (England and Wales)
Response from Propertymark
October 2025

Background

1. Propertymark is the UK's leading professional body of property agents, with over 19,000 members representing over 12,500 branches. We are member-led with a Board which is made up of practicing agents, and we work closely with our members to set professional standards through regulation, accredited and recognised qualifications, an industry-leading training programme and mandatory Continuing Professional Development¹.

Call for Evidence – overview

2. The Planning and Infrastructure Bill at the time of writing is currently making its way through Parliament, with the goal of making it easier to deliver critical infrastructure projects. To ensure that the Bill can be implemented quickly and can have an effective impact, the Ministry of Housing, Communities and Local Government (MHCLG) is seeking views on how to best implement the reforms of the Bill, as well as several other proposals designed to increase the speed in which planning applications of Nationally Significant Infrastructure Projects (NSIPs) can be approved.

Propertymark response – summary

3. Propertymark welcomes the opportunity to respond to respond to MHCLG's consultation on streamlining infrastructure planning. Delivering essential infrastructure will be vital for the UK Government to not only meet its housing targets but to ensure these new homes can attract new buyers. While Propertymark has supported the UK Government's reintroduction of housing targets, we are conscious that chasing target setting with no thought as to who will live in new homes is counterproductive and will not solve the UK's housing crisis. It is therefore positive to see that wider measures are being introduced to ensure that sufficient infrastructure is built to better accommodate new towns and homes, which will attract new residents into these areas.

¹ [The professional body for the property sector | Propertymark](#)

Considering this, our response is based on three objectives that we'd like to see from the planning system:

- **Supporting greater collaboration between applicants, statutory bodies, local authorities and the Planning Inspectorate** – collaboration with local authorities will clearly demonstrate what local objectives need to be achieved, statutory bodies can support projects to achieve greater outcomes and the Planning Inspectorate can help provide greater certainty over what documents and information applicants need to provide. All of this increases the speed in which applications can be approved and improves outcomes for Nationally Significant Infrastructure Projects.
- **Ensure that increasing the speed of the application process does not undermine the quality of infrastructure projects** – steps taking to increase the speed of the process must not compromise the quality of scrutiny of NSIP proposals. Failure to do so will result in NSIPs that fail to meet their objectives and do not achieve the economic objectives that the UK Government is seeking through these proposals.
- **Introduce measures to prevent poor quality applications being prioritised** – while the removal of the statutory consultation process may increase the speed in which applications are brought forward, it has the potential to be abused by local authorities or the Planning Inspectorate who are looking to approve certain projects quickly. For larger projects which require careful consideration and public approval, skipping the consultation process or skipping certain parts of it could in fact delay the project in the long-term as shortcomings with the project are discovered after being approved which could have been rectified during the planning process.

Consultation Questions

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.

4. We support the UK Government producing more prescriptive guidance about pre-application consultations and engagement in base of statutory requirements. While less prescriptive guidance can help the planning system be more flexible, more prescriptive guidance has two major benefits over less prescriptive guidance. These major benefits are the result of prescriptive guidance producing a more standardised pre-application process. The first benefit is that prescriptive guidance provides greater certainty for applicants who understand the specific steps they need to take, spending less time trying to work out what they need to include or achieve, and more on achieving what they need to include. This leads to a reduction in time and money spent during the pre-application process. The second benefit is for local authorities who would have access to the same prescriptive guidance. Local authorities would have to spend less time deliberating on what could meet the requirements in the pre-application process which a more open-ended and less prescriptive guidance could lead to. Instead, local authorities would be able to more quickly make decisions on how well applications have met pre-application requirements. These major benefits complement each other to produce quicker and more consistent planning decisions and applications.

Question 2: Should guidance note that collaboration outside of the NSIP process can help to address wider challenges that could otherwise impact development proposals? If so, what should it say?

5. Propertymark is open to the idea that collaboration outside of the NSIP process can help to address wider challenges that could otherwise impact development proposals. Guidance should focus on what applicants can do to demonstrate the benefits of their proposals, what local authorities are specifically looking for or what outputs/evidence would lead to more support from local authorities. The ultimate goal of collaboration outside of the NSIP process should be to increase the chances of an application being approved or to improve the transparency of what the project needs to achieve. As part of this, we would welcome the UK Government to consult local authority planning departments directly to understand what they would look for in a successful application.

Question 3: Would it be useful for applicants to consider these factors while preparing their applications and in particular in relation to any non-statutory engagement and consultation (at paragraph 19)? What changes or additions to these draft factors would you welcome?

6. The UK Government is proposing the following factors that applicants will have to include within their applications:

- **Prioritise front-loading**, so applications are well-developed by the time they are submitted and provide the right information for the Planning Inspectorate to determine whether the application is suitable to proceed to examination and are capable of being accepted and progressing through the regime within statutory timescales.
 - **Proportionate**, so that applicants can identify and understand issues that must be explored, addressed and decided during the NSIP process to enable the application for consent to be determined. If consultation and engagement is undertaken with communities, landowners, local authorities and statutory bodies, it should be done in a way that is proportionate to these aims, considering the nature and complexity of the proposal while ensuring infrastructure can be decided and, where consent is granted, developed in a timely manner. While informal, light-touch engagement may be sensible, multiple rounds of non-statutory consultation should be avoided.
 - **Open and transparent**, with applicants being clear about their proposals and the timescales they are working to and considering how accessible and understandable their documents are. If they consult and engage, they should be clear on the matters on which they are seeking views and which people can influence, and how responses will be taken into account in progressing the proposal.
 - **Timely**, so that applications progress to reasonable timeframes and informal engagement and consultation is timed to benefit the applicant's overall programme for their proposed development, giving proportionate levels of detail and sufficient time for consideration and response.
7. We agree that it would be useful for applicants to consider these factors while preparing their applications. As an additional fifth factor we would recommend introducing **"Identification of outcomes"**. This would require considerations for Local Plans and wider benefits from delivering key infrastructure (such as leading to the development of new homes or economic productivity gains). Identifying benefits early, especially those connected to Local Plans has three key benefits. Firstly, it encourages applicants to consider the wider community and or economic benefits of their applications, leading to more applications which produce better outcomes for the areas they will be built in. Secondly, it would help local authorities to distinguish better applications and justify them to the people they represent, thus making the application process quicker and less likely to be slowed down by challenges. Thirdly, during the consultation stage, it would enable experts and

other professionals to examine the benefits, challenge them and potentially highlight potential changes to the application that could further improve the benefits that are likely to occur.

Question 4: Do you agree guidance should set out at a high level the benefits of non-statutory engagement and consultation? Are there any benefits not listed which we should include?

8. We agree that guidance should set out the benefits of non-statutory engagement and consultation at a high level. We are concerned however that removing the statutory requirements for engagement and consultation could lead to a lack of scrutiny within the planning system. Where a project could have the favour of the Planning Inspectorate, planning authority and or local councillors, it could be fast tracked through the process without the need for consultation. This has three clear downsides. Firstly, it would demonstrate to the public that no clear vetting process was carried out, which would lead to considerable public backlash. This could lead to delays to the project through legal challenges and other public pressure. Secondly, the project wouldn't receive the same level of scrutiny as others, leaving out potential improvements are best and being poorly designed at worst. Thirdly, this would incentivise applicants to spend more time gaining favour with local authorities and planning departments over designing more beneficial projects as they would avoid scrutiny and not have to spend time consulting the community, experts and other interested parties. Ultimately, the lack of consultation leads to too many risks that worse projects will be accepted or that they would be in a worse state than they would if consultations took place. This could even lead to longer application periods if these projects were challenged due to a lack of oversight and scrutiny.
9. With this in mind, any guidance and information that sets out the benefits of engagement and consultation must strongly promote engagement and consultation. This maintains the UK Government's aim of allowing for greater flexibility in how consultation should be carried out while avoiding the downsides of having no engagement in the pre-application phase. Furthermore, there must be protections in place for situations when local authorities decide on a project that was not consulted on, especially when there are projects that have taken the time to engage with and consult the communities that would be affected by the project. This could be achieved by mandating greater transparency for how local authorities reach decisions on planning applications and giving powers to the Secretary of State to review decisions that do not appear to be in the best interests of the economy, local community and other factors up to the discretion of the Secretary of State.

Question 5: Should guidance encourage collaboration between applicants, stakeholders and statutory bodies? If so, what should it say? We particularly welcome views on how collaboration and prevent delays and the role for the sector to work collaboratively with stakeholders and how government can support this.

10. As mentioned in our answer to question 4, guidance must encourage collaboration between applicants, stakeholders and statutory bodies in order to promote the benefits that collaboration can lead to. As the leading professional body of property agents, we are primarily concerned with both the speed in which planning applications can be made but also that they must be effectively scrutinised so that they produce better outcomes, particularly leading to the development of new homes and communities people want to live in. This is especially important for infrastructure projects that would be difficult and expensive to fix if they were implemented poorly. Guidance should focus on the positive outcomes that need to be achieved, rather than providing a step-by-step guide on what to do. This can help support applicants to design an engagement and collaboration process that best suits their own expertise and helps them to focus on achieving a planning application where they can demonstrate better outcomes and that has better public support through collaboration.

Question 6: Should guidance include advice to local authorities, statutory bodies and applicants on finding the right balance between engaging early and engaging with sufficient technical information without creating unnecessary delay? We would also welcome comments on whether and how guidance could encourage applicants, local authorities and statutory bodies to work together to most effectively manage resources in their engagement

11. We would welcome guidance that provides advice to all parties involved in the planning process on how engagement can help identify sufficient technical information while striking a balance between improving applications while preventing unnecessary delay. Guidance should recommend active participation from local authorities, transparency around what outputs/outcomes they are looking for from a project as well as their system for grading applications.

Question 7: Is guidance needed to support applicants to identify which statutory bodies should be consulted based on the potential impacts of the proposed application? If so, what should that guidance include?

12. We think it is necessary to produce guidance to support applicants to identify which statutory bodies should be consulted on. In order to ensure all necessary statutory bodies are identified, we would recommend that local authorities should be involved in identifying bodies to consult. We state this because local authorities would be best placed to identify the correct bodies that are connected to the local authority and any national bodies involved in the region.

Question 8: Would additional government guidance on engagement with statutory bodies regarding environmental requirements be of value, in addition to the advice and guidance provided directly by those organisations? How can guidance support constructive engagement by statutory bodies? Please provide details on what would be most useful in government guidance relative to what is provided to other relevant organisations.

13. Yes, we would encourage the creation of guidance specifically regarding environmental requirements. This guidance should clearly demonstrate that statutory bodies and local authorities need to establish clear requirements for infrastructure projects and that they must work closely with applicants to demonstrate how these objectives can be achieved. We suggest this because this would save time and money for applicants to hire their own experts, only to be rejected by local authorities from not meeting objectives set in Local Plans. By directly working with local authorities and their own environmental bodies, projects can be updated based on what local authorities need to quickly approve planning proposals. This saves time and ensures that planning proposals more directly achieve environmental objectives set by local authorities.

Question 9: Is guidance needed to support proportionate, effective and constructive engagement from both the applicant and local authorities? If yes, what should such guidance cover?

14. Yes, as stated in our answer to questions 6-8, more direct engagement between local authorities and applicants would increase the speed in which applications can be approved while ensuring they are more directly meeting local authority objectives. Currently, applicants spend considerable time and resources in understanding local authority objectives which they emphasise in applications. However, objectives of local authorities could change over time even if a Local Plan has been published. Furthermore, additional evidence made available to local authorities could lead to them emphasising some objectives over another. Ultimately, it is not always possible to meet local authority expectations in the current process. More direct engagement with local

authorities enables applicants to fully understand what local authorities would like to see in projects and then design applications around that. Engagement should promote direct meetings and the promotion of being able to adjust projects in real time. Local authorities should be encouraged to share contact details of statutory bodies and other organisations that can help deliver technical knowledge and share expertise. Rather than approaching an application like a competition to see who can understand local authority objectives the best, an application should be seen as which organisation can best deliver on the objectives set.

Question 10: Is guidance needed to encourage applicant engagement with landowners and affected persons in a proportionate, effective and meaningful way? If so, we would welcome views on how guidance should support engagement with landowners and affected persons.

15. Yes, guidance should help support applicants to resolve any potential issues that landowners and affected persons may face. This guidance should focus on areas including:

- How to resolve disputes
- Exploring potential compensation
- How to ensure support or reduce concerns from affected persons
- How to prevent delays due to legal or other challenges from those effected
- How to consult with affected persons

Question 11: Should guidance support applicants to identify Category 3 people to be notified once an application is accepted for examination? If so, what should it say?

16. Yes, guidance should support applicants to identify Category 3 people to be notified once an application is accepted. We would encourage applicants to work with local authorities to identify which people/services would be impacted and how best to contact them. Local authorities may wish to share contact details of those affected.

Question 12: Is guidance needed to encourage applicant engagement with communities in a proportionate, effective and meaningful way? If so, what should it say? We would also welcome thoughts on how guidance can provide clarity and support engagement by communities.

17. Yes, guidance should encourage applicants to engage with communities. The guidance should demonstrate the benefits of engaging with communities, including how it can prevent disputes further in the application process.

Question 13: Should guidance continue to encourage applicants to use tools such as Issues and Engagement logs, and Principal Areas of Disagreement Summary Statements? Please comment on the value and scope of these documents for informing likely examination issues in light of the removal of statutory requirements for consultation. We also welcome views on any potential advantages or disadvantages for enabling a more effective examination if regulations required some of these documents to be submitted alongside an application.

18. We have no strong opinions on the use of specific documents and statements within the planning process. Rather than encouraging the use of specific documents, we would welcome that guidance should focus on achieving the outcome of that tools would produce, such as a list of engagement and summaries of disagreements. Where more useful for the applicant, these tools would be used. However, if an applicant has their own versions of these tools which would produce the same outcomes, this should be encouraged to increase the speed in which application requirements can be met.

Question 14: Are voluntary evidence plans an effective way of getting input on environmental issues early to inform environmental assessments and identify suitable mitigations? Please provide reasons.

19. We have no strong opinions of voluntary evidence plans. However, we would encourage that applicants should utilise environmental assessments early in the planning process. This would make it easier to engage with local authorities on the environmental objectives the application needs to achieve and what changes, if needed, would be required for the application to be successful.

Question 15: Should guidance set out the circumstances in which use of voluntary evidence plans might be beneficial?

20. Yes, this would ensure that applicants would only use voluntary evidence plans when they are needed.

Question 16: If guidance were to highlight the option to publish an engagement summary report, what might the potential advantages and disadvantages of this be? We would also welcome views on submitting this report alongside an application, especially what advantages and disadvantages there may be for a more effective examination if guidance encouraged or regulations required its submission.

21. An engagement summary report is useful for projects that could be controversial or do not initially have public support, enabling the applicant would be able to demonstrate that they have secured additional public, expert, impacted persons and local authority support. However, for smaller projects with public support, the need to publish an engagement summary report would be wasting time that could be spent taking the application forward. Additionally, if little public support has been gained, it would be quicker for the applicant to consider changes to the application without needing to public a summary report. Guidance should focus on when an engagement summary report is necessary, and the right amount of detail required in different situations. It may still be beneficial to produce an engagement summary report to highlight that initial support was maintained but that it doesn't need to be considerably detailed. A project with little initial support but gained significant support over the duration of engagement and consultation would require considerable detail.

Question 17: Do you agree that requiring the following information in notifications to the Planning Inspectorate, host local authorities, and the Marine Management Organisation would be beneficial in enabling them to prepare for examination? What other information or documents could be encouraged through guidance?

- (a) Whether a proposed application is expected to be EIA development**
- (b) When notifying the Marine Management Organisation, whether a proposed application is expected to require a marine licence for any licensable activities**
- (c) Where the most up-to-date information is published and available to view**
- (d) Publishing the notification on the applicant's project website**
- (e) Other**

22. We agree that requiring the following information in notifications to the Planning Inspectorate, host local authorities, and the Marine Management Organisation would be beneficial in enabling them to prepare for examination. We have no further comments to make regarding additional documents.

Question 18: Should guidance indicate a point at which the applicant should issue the notification?

If so, at what should it say?

23. Yes, we would encourage that the guidance state that the applicant should issue the notification as soon as they can and as soon as the information is known. We do not consider that updating this information would take enough time to warrant a delay in sharing this information.

Question 19: Do you agree that a specific format with contents requirements, would be beneficial to standardise this duty for both the applicant and the Planning Inspectorate when ensuring that this Duty has been met (please specify why)? We would also welcome views on what further guidance may support this clarity

24. Yes, we agree that a specific format with contents requirements would be beneficial to standardise this duty for both the applicant and the Planning Inspectorate. This is because standardisation would help both parties familiarise themselves with the process and enable them to quickly fill in and review the information especially in the long-term.

Question 20: Do you agree with the proposal to move to a 'digital first' approach by only requiring information to be made available for inspection online? Please explain why. The government would welcome information and data about any potential impacts, including equalities impacts, of this change.

25. Yes, we agree with the proposal to move to a 'digital first' approach. This would lead to the wider adoption of current technology that enables documents to be shared, viewed and edited (by authorised parties) in real time. This prevents lengthy delays for planners to send back paper documents or even documents via email. If documents can be edited in real time, those seeking updates on changes would be able to read them much quicker as well. To prevent issues where documents would be unreadable by those who lack internet access or are otherwise unable to access documents easily online, we would encourage that physical copies of documents be made available by request for the purpose of consulting the public.

Question 21: What further guidance would support applicants to undertake effective publicity which enables transparency and public awareness?

26. We see transparent and open access to documents as the fundamental approach to increase publicity, transparency and public awareness of applications.

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?

27. There would be a considerable challenge to creating guidance on how applicants will meet the acceptance test that is applicable to all projects. This is due to multiple factors, including the scale of the project, the urgency for a project of its kind, what kind of infrastructure is being developed and what additional outcomes are needed to name a few. Due to this, guidance should clearly state which conditions would need to be met in order for specific documents to not be required. For example, an engagement summary report may not be required for smaller projects or where high levels of public support has already been evidenced. Further to this, we would encourage local authorities to engage with applicants to determine which documents are essential and which would meet a greater standard than the minimum. This would help to clarify exactly what each project would need to achieve, ensuring that applicants have greater certainty and focus only on what they need to provide.

Question 23: How can applicants outline how they have had regard to section 51 advice from the Planning Inspectorate when they submit applications, and what should be encouraged through guidance?

28. Guidance should encourage applicants to engage with local authorities and the Planning Inspectorate. As highlighted in multiple questions, applicants and planning authorities should be encouraged to work together to create a higher quality application and project. The proposals to remove statutory elements of the process would benefit this as planning authorities will be able to highlight what they would like to see from applicants, what is needed and what is unnecessary. Having regard to section 51 advice in this way should be evident in changes made to applications, rather than requiring applicants to summarise their changes. Although should they wish to do so, planning authorities could provide a simple way for applicants to do so that is not unnecessarily time consuming.

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

29. The UK Government is considering the following to strengthen to use of IAPs:

- Strengthening the definition of an IAP so that Examining Authorities are directed to identifying issues that are critical to the planning decision
- Requiring the Examining Authority to submit the IAP to the relevant Secretary of State once it has been prepared
- Requiring that the Examining Authority clearly demonstrates how the IAP has informed its decisions on the timetabling for the examination
- Requiring the Examining Authority to explicitly link the IAP to the recommendation to the Secretary of State by showing how these key issues identified were considered during the examination process

30. In addition to the above considerations, we would recommend that an initial draft IAP be shared with the applicant to highlight potential issues and to work with the applicant to see if these issues can be resolved before the final version of the IAP is published. This would support the applicant to make necessary amendments to the project if addressing them would lead to a more successful project with better outcomes or a quicker application process.

Question 25: Do you agree that existing guidance provides enough information to aid local authorities in preparing meaningful local impact reports and should therefore be retained? If further information would be beneficial to be included within this guidance what should it say?

31. We are not best placed to respond to this question, we would recommend that the views of local authorities and developers that rely on these reports should be considered.

Question 26: Is existing guidance clear on the difference between a relevant representation, written representation and local impact report? What further information on the differences between a local impact report and relevant representation would be beneficial to assist local authorities?

32. We are not best placed to respond to this question, we would recommend that the views of local authorities and developers that rely on these reports should be considered

Question 27: How can guidance seek to reduce existing barriers that public authorities face in engaging with the process?

33. In addition to guidance, we are concerned that the largest barrier to local authority engagement in the process is a lack of resources and staffing issues. Sufficient resources must be dedicated to local authority planning departments, so they have the capacity to engage effectively with applicants and examinations.

Question 28: What should guidance say to ensure public authorities engage appropriately with examinations? We would welcome views on how guidance can outline the circumstances in which public authorities are relevant to the application.

34. We would welcome guidance that helps to promote flexibility on requirements and support for applicants based on the individual specific nature of each project. While some standardisation will be appropriate, it can be difficult to account for the wide variety in types, scales and outputs of projects. Local authorities should be expected in part to act on their own discretion on how to maintain a balance between supporting applicants to understand what they need to achieve, supporting a faster application process while retaining a good level of scrutiny as to prevent poor quality projects from being approved for the sake of increasing the speed of the process.

Question 29: Do you consider that regulations for compulsory acquisition as part of DCOs should, where possible, limit the duplication of procedures where land acquisition changes are required and to provide the Examining Authority with greater discretion to set reasonable timeframes to reflect the specific circumstances of each DCO and its associated land acquisition issue?

35. Yes, we agree with the proposals set out in question 29.

Question 30: Are there any further changes that could be made to the infrastructure planning CA Regulations and supporting guidance to contribute to the streamlining of the DCO examination process by reducing repetition or timescales where changes to land acquisition are required post submission?

36. We have no further comments to make at this time.

Question 31: In addition to the changes highlighted in Chapter 3 of this consultation, what further changes to pre-examination and examination guidance would support efficient and effective examination of applications for development consent?

37. During the examination process, we would welcome guidance for examiners to provide early feedback to applicants. Where, for example, a specific element can be highlighted as a major barrier to the approval of the project which can still be rectified, examiners should share this with applicants. This would be before a decision has been made on the entire project, which could take additional time. In the meantime, while the project is being examined, the applicant would have the ability to make amends to that specific part of the project. This prevents the applicant from having to wait until the end of the examination and can improve the project while the rest of the application is being examined.

Question 32: Are there further changes to secondary legislation – for example, the Infrastructure Planning (Examination Procedure Rules) 2010 – which you believe government should consider to support effective and efficient examinations?

38. We have no further comments to make at this time.

Question 33: Is government correct in seeking to reframe the pre-application services provided by the Planning Inspectorate in this way? Are these the right objectives? Are there any additional changes to these services in light of the removal of statutory pre-application consultation that guidance should seek to clarify? We would particularly welcome reflections from developers on what factors they take into account in determining which service is most appropriate for their project.

39. By removing the statutory pre-application consultation requirements, the UK Government is expecting the Planning Inspectorate to centre its pre-application services around the following three objectives:

- First, to continue to provide an impartial view on questions of a planning nature ('merits advice') which relate to potential examination issues, and the quality of an application so that it is ready to proceed to examination. This includes commenting on the quality of documents which will be required to accompany an application at submission so that they are clear and comprehensive. Views provided will not prejudice the examination process.

- Second, to support understanding and uptake of government's new guidance on how to prepare applications. By virtue of its central position in the planning system, in relation to specific matters raised during pre-application applicants may seek input, advice, and guidance from the Planning Inspectorate about which critical stakeholder(s) could help them to improve the quality of their application and fill in gaps of missing information.
- Third, where appropriate and necessary, the Planning Inspectorate can use its discretion and the ability to issue advice under section 51 to formally advise applicants on all of the above ahead of an application being submitted, including sufficiency of engagement with statutory bodies on environmental issues.

40. It is positive to see that the UK Government is encouraging the Planning Inspectorate to actively engage with applicants, so they better understand the steps they need to take to proceed through the planning process and what they need to include. The three objectives, if promoted correctly and taken up by the Planning Inspectorate, should help to ensure that applications are not based on how well the applicant has technically met planning requirements but on the outcomes their application would achieve. The UK Government must promote valuing outcomes and evidence used to demonstrate how these outcomes would be achieved over technical faults with filling in the required forms of the planning process.

Question 34: What alternative models could government consider for pre-application support in order to enable better collective oversight and co-ordination of input across statutory bodies?

41. We have no further comments to make at this time. Our response to this question, that greater collaboration from local authorities (so that applications meet Local Plans and wider community objectives) and the Planning Inspectorate (so that applications have all the necessary information the inspectorate is looking for) has been answered in earlier questions.

Question 35: What steps could government take to make the enhanced service more attractive to applicants of complex and high priority projects?

42. We would encourage that, during the pre-application phase where applicants are engaging with local authorities and the Planning Inspectorate, that they should be encouraged to take the enhanced service. This would be based on if the local authority or Planning Inspectorate believes that the project would benefit from the enhanced service. The UK Government may wish to

provide guidance that would demonstrate to applicants, local authorities and the Planning Inspectorate which projects would benefit most from the enhanced service.

Question 36: Should guidance be more directive in setting out that, where applicants are advised that a project has been assessed by the Planning Inspectorate as being in need of a higher level of service (for reasons including project complexity and local circumstances), applicants are expected to adopt that level of service?

43. Yes, we agree that guidance should be more direct in setting out that applicants should adopt the higher level of service when beneficial for the application to be approved in the fastest or most effective way. Making it more explicit would encourage applicants who may consider the higher level of service to take longer even when the standard service may be bogged down in delays.

Question 37: Should guidance also specify that recommendations made by the Planning Inspectorate on the allocation of their pre-application services ought to be informed by considerations about whether the project or project type has been identified by government as a priority? If so, would this have any unintended consequences? Would it be important for government to be clear and transparent on what its priority projects are?

44. Yes, the UK Government must be clear and transparent on what its priority projects are. This would help to incentivise more applicants to come forward with projects, especially those which would achieve wider government objectives and priorities. The Planning Inspectorate should consider this in the allocation of their pre-application services to ensure that time is best spent delivering priority projects. Failure to do so would mean key infrastructure or projects that don't meet priority objectives would take up too much of the Planning Inspectorate's resources.

Question 38: Are there any changes that could be made to pre-application service offerings by public bodies?

45. As is our position on local authorities and the Planning Inspectorate to work with applicants, we would encourage the UK Government to set requirements (with appropriate allocated resources) to support public bodies to work with infrastructure projects. We would envision that the UK Government would set criteria for involvement, such as the size or impact of the project. This would help public bodies to assess the impact of vital infrastructure projects, ensuring few

negative consequences are introduced as a result of the project. Additionally, the public bodies could identify ways of improving the project, such as improvements to environmental impact.

Question 39: Should the ability to cost recover be extended to additional or all statutory bodies that are prescribed in the Planning Act 2008 and Schedule 1 to the 2009 Regulations (as amended?)

46. We would encourage that cost recovery should be extended to all statutory bodies that are prescribed in the Planning Act 2008 and Schedule 1 to the 2009 Regulations. This would encourage more bodies to offer their expertise to planning proposals, the cost of which would ultimately be recovered by the UK Government through benefits the project will bring to the wider economy.

Question 40: How should government develop key performance indicators for public bodies providing cost recoverable services for NSIP applications, and if so, what should those key performance indicators contain?

47. We would recommend seeking input directly from public bodies providing cost recoverable services for NSIP applications. Their insight in this would be more valuable than what Propertymark can provide.

Question 41: In what ways can government support local authorities as they implement cost recoverable services?

48. We would recommend seeking input directly from local authorities. Their insight in this would be more valuable than what Propertymark can provide.

Question 42: How else can government support local authorities in their role engaging with NSIP applications, as they adapt their role to take account of reforms through the Planning and Infrastructure Bill?

49. We would recommend seeking input directly from local authorities. Their insight in this would be more valuable than what Propertymark can provide.

Question 43: Do you agree that there remains merit for applicants in a fast-track process, based on shortened examinations delivered through primary legislation and with the process set out in

guidance, that is designed to deliver a faster process for certain projects? If yes, give reasons why it is not being used currently; if not, please give reasons.

50. We are unaware of the reasons why no applications have opted for the fast-track process. While we may be able to speculate, we would recommend seeking the opinions of developers and other planning applicants who have explicitly opted not to use the fast-track process.

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.

51. We have no further comments to give at this time.

Question 45: How do you think the existing fast-track process could be amended to support delivery of government's priorities, and be more widely applied to applicants? We are also interested in views on how government should determine and communicate which projects it considers to be a priority for taking through the pre-application, examination and decision process

52. We have no further comments to provide at this time.

Question 46: In what ways can government and its agencies best support applicants and relevant stakeholders to achieve robust, and faster decision timeframes during the pre-application, examination and decision process? Please indicate your views on the following potential changes, covered in this section. Please suggest practical measures, tools, or desired policy changes, and give reasons to support these:

(a) Adapting the existing process so that it supports those projects which are considered by government to be a priority for fast-tracking.

53. We support the adaptation of the existing process so that it supports projects which are considered by government to be a priority for fast-tracking. This could be achieved by including "is this project a government priority" in how applications are weighted, with more time and resources dedicated to those which are a priority and meet priority objectives. Local authorities, statutory bodies and the Planning Inspectorate should be encouraged to spend more time ensuring these projects are

not only fast-tracked through the process, but any potential issues are ironed out so that these projects achieve more beneficial outcomes.

(b) Developing an approach based on a more proactive role for government and its agencies facilitating fast-track projects through the pre-application, examination and decision process.

54. We agree that there should be a more proactive role for government to fast-track projects. As with our approach for applications to be taken through the enhanced process, guidance should be given to the Planning Inspectorate to strongly recommend that the application should be fast-tracked, even if the application was not initially.

(c) Support priority projects to be fast-tracked, by reducing / removing applicant choice from the decision about whether to apply a fast-track process.

55. We would recommend against removing the choice from the applicant to decide whether or not to fast-track the process. There could be legitimate reasons why the applicant did not wish to fast-track their application. This could be down to capacity or the resources of the applicant to fast-track the process, which if forced could lead to negative consequences for the applicant and could delay the project from going forward once approved.

(d) Introduce greater flexibility by adapting the current guidance to make it clear that the priority level of the project will form part of an overall assessment about the eligibility of the project for the fast-track process.

56. We have no concerns regarding introducing greater flexibility by adapting the current guidance to make it clear that the priority level of the project will form part of an overall assessment about the eligibility of the project for the fast-track process.

Question 47: Do you have any other comments or suggestions regarding the fast-track process or related policies?

57. We have no further comments to provide at this time.

Question 48: Do you agree that pre-application consultation requirements under the Town and Country Planning Act for onshore wind developments should be removed? Please give reasons.

58. We do not think that pre-application consultation requirements under the Town and Country Planning Act for onshore wind developments should be removed. A pre-application consultation would help to identify the impact onshore wind developments would have on demand for properties in the area. This would be useful in understanding the impact of onshore wind developments on the UK Government's ability to build 1.5 million homes. Should a particular region be significant in enabling the achievement of this goal, it would be devastating if onshore wind development would mean that fewer people would want to move into new homes in that region. This is something that a pre-application consultation can demonstrate.