

April 2025



INTERACT
INFORM
INFLUENCE

The Planning and Infrastructure Bill

Evidence from The Housing Forum

Response submitted by:

Anna Clarke, Director of Policy and Public Affairs

On behalf of [The Housing Forum](#), 1 Minster Court, Mincing Lane, London EC3R 7AA

Anna.clarke@housingforum.org.uk or info@housingforum.org.uk. 07442 405513.

About The Housing Forum

The Housing Forum is the UK's cross-sector, industry-wide organisation that represents the entire housing supply chain. Our growing membership drawn from over 150 organisations across the public and private sectors and includes local authorities, housing associations, housebuilders, architects and manufacturers. All share our determination to drive quality in the design, construction and decarbonisation of UK homes. They have a commitment to partnership working and share in our vision of 'A Quality Home for All'.

In order to achieve this, we have advocate for policy change needed for everyone to live in a good quality, sustainable and affordable home. Our key [Housing Solutions](#) set out how we think this can be achieved.

info@
housingforum.org.uk

Introduction

The Housing Forum broadly welcomes the content of the new Planning and Infrastructure Bill. We have long been calling for measures to streamline and accelerate the planning process, such as our reports: on [Streamlining Planning](#) and on [Validation Requirements](#).

We have a working group on planning who include professionals and experts from across the sector, including those working for local authorities, housebuilders, architects and housing associations. This group has come together to discuss the new Bill, with the rest of our membership also invited to contribute their views.

INTERACT
INFORM
INFLUENCE

Summary

- The Housing Forum welcomes the proposals to **streamline planning committees**, particularly the focus on training for councillors who sit on planning committees, the cap on size, and having a separate committee for strategic planning. We have some concerns around the plans for a national scheme of delegation and how this would work in a practical sense if compliance with policy is used as a reason to delegate to officers, as this is rarely black and white.
- We support the plans for a **Nature Recovery Fund** to ensure that funding for nature recovery is put to the best use, and that development of much-needed new homes is streamlined. We do, however, identify some risks from the proposals including a loss of control over how money is spent, causing public distrust in the system, and increased complexity if this new system sits alongside existing site-level provisions, such as biodiversity net gain.
- The focus on **strategic planning** seems broadly positive, though we are concerned about the cumulative impact of this coming in at the same time as other aspects of devolution and local government reorganisation. It is difficult to work strategically with levels of government and entities that may not exist in the future. There is a clear risk of policy paralysis while local government is reorganised, causing a hiatus in Local Plan making and in housebuilding. It is therefore essential that the Government fully considers the best order to make changes in and makes a **transition plan** for all the changes that are coming through to ensure that housing delivery can continue without disruption.
- The reforms to **CPO powers** are sensible, but for the benefits of these to be fully realised, Government must support local authorities in having the skills and confidence to use CPOs effectively.
- **Other planning reform needed** but not included in the draft Bill includes relaxation of planning rules near railway stations, standardising validation requirements, a focus on the quality of permitted development, and clarity on the role of planning in net zero.

info@
housingforum.org.uk

The Housing Forum Ltd
6 Floor, 1 Minster Court
Mincing Lane
London EC3R 7AA

Registered Company
Number 03785174

Evidence

1) Planning committees

1. The Housing Forum responded to the working paper on planning committee reform – our response [can be read here](#): Housing Forum members from across the sector appreciate the rationale behind the proposed reforms – all agree that planning can become politicised in a way that does not serve the greater good, and that councillors can have pressure put upon them by local residents to block applications for reasons that are not, on balance, in the best interests of current and future populations.
2. There are, however, some concerns about the proposals to remove powers from local authorities to determine individual planning applications – noting that planning is a key area in which many people do try to engage with local government and democracy. There are also concerns with the practicality of using compliance with development plans and local policies as a factor for determining which applications go to committee, when this is rarely black and white. For instance, local planning policies may refer to national guidelines, without specifying which guidelines they mean causing disputes as there is more than one national policy that could be meant. A national scheme of delegation to cover minor and householder applications and reserved matter applications would be easier to implement.
3. We see strong and widespread support for the proposals for a separate strategic planning group and for compulsory training of councillors sitting on planning committees. Local authorities should be actively engaged over the content of this training. If it is to be provided locally (rather than nationally) then local authorities need to have adequate resources for it. Training should be ongoing to ensure councillors remain up to date on planning legislation. There also needs to be a system that allows planning committees to keep functioning smoothly if local elections cause a change of membership.
4. There is strong support for setting limits to the size of planning committees – committees that are too big can be less effective. We would note that some larger authorities already operate more than one planning committee, which run in parallel to ensure the workload is manageable on individual councillors – this system works well as it can reduce the time applications are waiting to be considered by a committee and should be encouraged. Regulations should also permit online meetings of planning committees.
5. We would also add that if the role of councillors in determining individual planning applications is to be reduced, it is particularly important for them to engage proactively with making local plans. Some authorities do this very successfully.

2) Method of updating national policy statements

6. The Housing Forum is supportive of a more standardised and timely approach to updating national policy statements. The planning system benefits from consistency in approach, so ensuring that the policies comply

INTERACT
INFORM
INFLUENCE

info@
housingforum.org.uk

The Housing Forum Ltd
6 Floor, 1 Minster Court
Mincing Lane
London EC3R 7AA

Registered Company
Number 03785174

with legislative changes or new legal judgements is helpful, but further amendments to them beyond this might not be.

3) The Nature Recovery Fund

7. The Housing Forum has responded to the working paper on this and our response [can read here](#). Our main points are:
 - We appreciate the government's ambitions to ensure that funding for nature recovery is put to the best use, and that development of much-needed new homes is streamlined.
 - Potential benefits of the new approach include a reduced burden on individual reports at site level and improved outcomes for nature via a more strategic approach.
 - The risks of the proposed system include a loss of control over how money is spent, causing public distrust in the system, and increased complexity if this new system sits alongside existing site-level provisions, such as biodiversity net gain.
 - We appreciate the government's ambitions to ensure that funding for nature recovery is put to the best use, and that development of much-needed new homes is streamlined.
 - We are aware that the Government's initial objective is to find a better way of dealing with nutrient neutrality requirements. Beyond this, we see a strong case for a 'scoping survey' or similar, to be used on most sites to identify any particularly acute ecological concerns. This would be presented to the planning department and for most sites would be sufficient in terms of surveying, allowing them then to proceed down a fast-track route whereby a payment is taken for any environmental issues to be dealt with strategically. Where the scoping survey identifies significant ecological concerns with the site, the LPA could then request fuller surveys which may require other solutions.
8. The Fund could be expanded to deal with other aspects of environmental damage and nature recovery in time. We would be particularly keen to see biodiversity net gain included within the Nature Recovery Fund, especially for small sites (including smaller major planning applications).
9. Housebuilders are also concerned around the capacity of Natural England or other public bodies to develop Environmental Delivery Plans and to ensure that there is always enough provision in them to cover new housing applications. If they are slow to be developed or they run out of capacity this could slow down housing delivery.

4) Development corporations

10. The Housing Forum welcomes the improvements to development corporations, as these are a good way of delivering large-scale projects and new towns. We would like to see a broad range of agencies involved with them, including transport, education and health, to ensure that new towns have all the services they need.

INTERACT
INFORM
INFLUENCE

info@
housingforum.org.uk

The Housing Forum Ltd
6 Floor, 1 Minster Court
Mincing Lane
London EC3R 7AA

Registered Company
Number 03785174

5) Strategic Planning

11. The Housing Forum is positive about the proposed improvements to strategic planning and inclusion of Spatial Strategies, which has been very much lacking from the planning system in recent years. The Duty to Cooperate and voluntary joint working between authorities has been very successful in some areas, but much less so in others.
12. We are, however, concerned about the cumulative impact of this coming in at the same time as other aspects of devolution and local government reorganisation. It is difficult to work strategically with levels of government and entities that may not exist in the future. There is a clear risk of policy paralysis while local government is reorganised, causing a hiatus in Local Plan making and in housebuilding. It is therefore essential that the Government fully considers the best order to make changes in and makes a transition plan for all the changes that are coming through to ensure that housing delivery can continue without disruption.

6) CPO powers

13. The changes to CPO powers included in the Planning and Infrastructure Bill are relatively minor and sensible.
14. There is, however, much variation between local authorities in their capacity and appetite to use CPOs. Whilst some authorities make regular use of them to assemble land and bring projects forward, others never use them at all. Some authorities lack in-house expertise around CPOs, and lack confidence in them. For CPO powers to fulfil their potential, this lack of capacity within local authorities needs to be addressed.

7) Fee-setting for planning authorities

15. The Housing Forum supports the principle of cost recovery. Our previous [response to the NPPF consultation](#) sets out our views on fees (Chapter 11).
16. We are broadly supportive of fees being set locally – with important oversight to ensure that they reflect actual costs and checks on outliers. Using a common framework for setting fees and publishing the rates so that outliers can be easily identified should help with this. A clear framework for what can and cannot be included should be provided for local authorities.
17. Many planning departments are under-funded with unfilled vacancies. If the fees simply cover their existing spending this will not improve them. It is therefore important that local authorities are allowed to set fees to cover a growth plan rather than just existing spending. This growth plan should aim to fill unfilled posts and invest in things to improve efficiency, such as new IT systems, so as to improve the level of service provided and determine planning applications within statutory timescales. This may include increasing planners' salaries, where it can be shown that they are too low to attract the skilled staff needed.
18. We note that the proposals are that local plan making is not covered by the fees. We would, however, be happy to see a percentage uplift applied to the

costs of determining applications, to cover the cost of making the local plan, as long as this too is ringfenced for the planning department.

19. Many authorities make extensive use of Planning Performance Agreements (PPAs) whereby applicants pay for pre-application advice and an agreed level of service and timelines in determining the application. If application fees are set at a rate that fully covers the cost of determining the application, then the role of PPAs would seem to be limited to only the pre-application advice, as to charge for further services would be double-charging. Government should therefore clarify the role of PPAs in the new framework.

**INTERACT
INFORM
INFLUENCE**

8) Brownfield passports

20. The Housing Forum is broadly supportive of brownfield passports, though notes that many brownfield sites are challenging to build on with issues such as contamination to be dealt with. This may mean that even with passports, planning and viability remain challenging.

9) Energy and infrastructure

21. The Housing Forum supports the decarbonisation of our housing stock, including the move away from gas and onto renewable energy sources. This necessarily entails significant changes to our energy infrastructure, so we are pleased to see the Government addressing some of the challenges in this.
22. One issue that needs also to be considered is housing the workforce for delivering new infrastructure. Projects that employ a large number of people, often in rural locations away from major housing markets, can cause a lot of disruption and fuel homelessness locally. The Government should make a workforce housing plan when proposing new infrastructure that will employ large numbers of workers for a short period. This may include providing transport for workers from nearby settlements or the provision of temporary housing, such as static caravans or modular housing.

info@
housingforum.org.uk

10) Other planning reform needed but not included in the draft Bill

Land near railway stations

23. The Housing Forum has suggested that planning rules could be relaxed for sites within a short distance of a railway station. We were encouraged [the Chancellor propose that this would happen](#) via the new Plan for Change, but note that there is no mention of it in the Planning and Infrastructure Bill.

Standardising validation requirements

24. We would also like to flag our recent report on [Validation Checklists](#), and would urge the government to take this opportunity to reduce and standardise the approach taken to validation requirements.

Permitted Development

25. Our members are aware of issues with the quality of permitted development and this issue has not been mentioned at all in the new Bill.

Net zero

The Housing Forum Ltd
6 Floor, 1 Minster Court
Mincing Lane
London EC3R 7AA

Registered Company
Number 03785174

26. There is also relatively little mention of the link between planning and net zero – which is not helped by the details of the Future Homes Standard still not being published by Government.

**INTERACT
INFORM
INFLUENCE**

info@
housingforum.org.uk

The Housing Forum Ltd
6 Floor, 1 Minster Court
Mincing Lane
London EC3R 7AA

Registered Company
Number 03785174