

ICE submission on proposed reform to the NPPF

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About the ICE

The Institution of Civil Engineers (ICE) is a 97,000-strong global membership organisation with over 200 years of history.

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Its network of experts offers trusted, impartial advice to politicians and decision makers on how to build and adapt infrastructure to create a more sustainable world.

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Submission

The ICE welcomes this update to the National Planning Policy Framework (NPPF). It represents a fundamental and welcome reset of the tool.

As a general comment, the ICE strongly supports the commitment to improving the 'rules-based' nature of the planning system as demonstrated in the NPPF draft. Certainty is incredibly important to investors, developers and supply chains, and the shift to the presumption in favour of suitably located development is welcome. These changes operationalise the strategic shift we have witnessed in the last year across the introduction of strategic documents like the infrastructure and industrial strategies. The next step will be demonstrating to the feasibility of delivery to the public. Speeding up and simplifying the planning process is an important step towards doing that.

Further, and in addition to the answers we provide addressing the consultation questions laid out below, it is worth noting that change at the planning inspectorate and local authority levels, and improved coordination of decision making will be crucial to the success of these reforms and the implementation of the Planning and Infrastructure Act. We outline further thinking on this in the section towards the end of the submission.

Consultation questions and ICE responses

Spatial planning

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

Yes, the ICE strongly supports improved strategic planning at the sub-regional level. Their definition and addition in the planning hierarchy rightly recognises the need for more detailed planning to be covered in lower-level documents, while the spatial development strategies (SDSs) set out a broader strategic plan for the area. They provide a useful tool to counter shorter-term political cycles and improve certainty.

The overarching issue in housing provision to date has been the lack of a truly strategic approach to housebuilding. There has been little alignment between housing decisions and any spatial, infrastructure or supply chain strategies or wider national goals. SDSs must take

full account of national plans and align appropriately to avoid carrying on the current approach which sees subnational authorities largely determining the geographic spread of new housing in a way that is misaligned with national plans and needs¹.

The development of the strategies should be effectively supported by the National Infrastructure and Services Transformation Authority (NISTA's) spatial tool and be coordinated with sector-specific regional strategies, like the proposed regional plans for the water sector which are committed to in the recently released water white paper² and the National Energy System Operator's strategic spatial energy plan.

The ICE supports a revision of a strategy every five years, only where there are significant changes to housing need, or there is substantial additional enabling infrastructure committed to outside of the strategic planning process – noting that revisions to the 10 Year Infrastructure Strategy (10YIS) which SDSs will occur every two years. In the draft text, the alignment with the 10YIS and other strategies and allocations could be more explicit.

It is, however, positive that the 5-year review window aligns well with utilities' planning horizons, which has not been the case to date meaning that developers have raised concerns about utilities companies' inability to provide adequate services and upgrade assets at the required pace to serve community need³.

But these reviews should not take a backwards looking view on already planned for development. Including language about not revoking allocations unless there are extenuating circumstances would be a positive addition to PM1 as drafted.

Local plans and cross-boundary coordination

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

Yes, in particular the ICE supports the possibility of joint local plans prepared by two or more local planning authorities where this would enable local planning matters to be dealt with most effectively.

Local plans should retain the focus on a 15-year period from the point of adoption as set out in the revised NPPF text.

But clear guidance should be developed to ensure that local and strategic authorities aren't waiting for SDSs to be developed before developing their local plans. Local government reorganisation, and further devolution policy has placed pressure on existing local authority resources and there is a risk that this process may be deferred in some areas. Despite these pressures, coordinated development is still necessary to deliver the housing and infrastructure required by the UK public.

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

The ICE strongly supports the inclusion of the clear need to engage proactively with infrastructure providers. Early, strategic, engagement with infrastructure providers is central to enabling sustainable housing growth.

The ICE has previously highlighted the absence of shared objectives between the public and private sectors, and between different public sector bodies, to deliver housing and infrastructure in a coordinated way. This fragmentation is often because they have been thrown together by circumstance, rather than working in strategic partnership with early engagement.⁴

The replacement of the duty to cooperate is welcome, but there are still outstanding questions about the effectiveness of this new approach. Implementation will need to ensure that PM10 and 11 carry enough weight to support improved cooperation.

Do you agree policy L1 provides clear guidance on how Local Plans should be prepared to promote the efficient use of land?

¹ ICE (2025) [ICE Insights Paper: Enabling housing growth through infrastructure](#)

² Defra (2025) [A new vision for water: white paper](#)

³ ICE (2025) [ICE Insights Paper: Enabling housing growth through infrastructure](#)

⁴ ICE(2019) [Infrastructure & Housing: State of the Nation 2019](#)

The ICE strongly supports improvements to the use of existing infrastructure – both through repurposed site usage and minimum density standards which increase asset use and position populations closer to existing services. This clear shift towards connectivity-led planning is an important improvement.

Planning for climate change

Do you agree with the approach to planning for climate change in policy CC1? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

The ICE strongly agrees with the requirements for plan-making in accordance with goals to reduce carbon emissions and adapt to the effects of climate change, including the reference to the provision of green infrastructure and nature-based solutions.

In particular, the change to a default ‘yes’ for development around train stations in existing settlements and well-connected stations outside of existing settlements, including on green belt land is positive.

In 2022, Centre for Cities reported that almost half of suburban neighbourhoods near existing stations make little or no contribution to new housing supply because development is blocked. Instead, most new homes are concentrated in certain “intensive” locations in city centres or in car-dependent estates on the outskirts of cities. Milton Keynes, for example, has six railway stations, but was building 95% of its homes out of walking distance of any of them⁵.

Making better use of existing assets means co-locating housing and infrastructure to provide additional value for the end-consumer. This contributes to the UK’s decarbonisation goals by enabling more sustainable transport choices to be taken.

Do you agree with the approach to climate change adaptation through planning decisions in policy CC3? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

The ICE strongly agrees with the direction of travel in CC3. However, the policies set out in F8 which directly relate to this section could be strengthened.

Despite promises to enforce the mandatory adoption of sustainable drainage schemes (SuDS) by 2024 as laid out in Schedule 3 of the Flood and Water Management Act 2010, regulations remain stalled. The current language in F8 could be strengthened to reflect the need for construction work, as enabled by the plan, which has drainage implications to not be commenced unless a drainage system for the work has been approved.

Wording in F8 could more closely resemble the language used on low carbon and renewable energy solutions in section W3(2).

⁵ Centre for Cities (2022) [Why are cities in Britain building so many new homes out of reach of public transport?](#)

“Applicants should not be required to demonstrate the need for renewable or low carbon energy development and electricity network infrastructure. Where proposals for this form of development come forward outside areas which have been identified as suitable for them they should be acceptable when assessed against the national decision-making policies in this Framework, taken as a whole.”

In lieu of the full implementation of Schedule 3, planning tools like the NPPF have the opportunity to normalise and encourage the uptake of SuDS.

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

Yes.

Sector specific feedback

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

The ICE supports the focus on water supply for development, and water quality. However, it is worth noting that local and strategic development strategies should take account of the regional plans outlined in the Department for the Environment, Food and Rural Affairs’ water white paper. They will set out investment priorities to meet national objectives. Plans should take account of these and other national and regional policy statements.

The government is also considering opportunities to align existing planning tools and groups such as catchment partnerships. These groups will work with the Department for Environment, Food and Rural Affairs (Defra) to co-design a new regional planning framework for implementation in 2027.

The addition of a requirement for proposals to account for these and other national policy tools would be useful.

Do you agree that policy TR1 will provide an effective basis for taking a vision-led approach and supporting sustainable transport through plan-making?

The ICE supports the effort made in TR1 to bring about a vision-led approach to transport planning, but further guidance will be required.

Further, to achieve an actual vision led approach for transport, England requires a national transport strategy which sets out an overarching vision of a sustainable transport network and informs local planning. The upcoming Integrated National Transport Strategy provides an opportunity to address this.

If employed properly, the INTS could establish a ‘golden thread’ of desired outcomes across modes and levels of government by drawing together the existing array of strategies into a coherent framework, and identifying and addressing policy gaps and areas of need. It should set out how transport will contribute to delivering net zero and an equitable transition. It should also identify other long-term economic, environmental and social priorities, such as economic growth, reducing inequalities and climate resilience. This should clarify the role of transport in delivering them and the appropriate level of investment between modes and regions⁶.

TR1 and further guidance should support and coordinate with the provisions in the INTS once released.

Culture change must come alongside planning reform

Alongside the implementation of the Planning and Infrastructure Act, as well as revisions to existing policy tools including the NPPF, culture change in the planning inspectorate and local and strategic authorities is required. There is also a need to implement the policy instruments that are already available, make better use of digital technologies and bring together key decision-makers – including ministers – to speed up change.

⁶ ICE (2023) [ICE Policy Position Statement: A national transport strategy for England](#)

The planning system needs to be rationalised, better coordinated and properly resourced. At present, planning is not an adequately attractive profession, so capability and capacity are enduring issues which slow down decision-making. Pay at the Planning Inspectorate and across local and strategic authorities has declined, with planners able to earn significantly more in the private sector. Regulators such as the Environment Agency, and other prescribed consultees, are also often under-resourced, which undermines their ability to attend hearings and planning meetings and adhere to timelines for reaching decisions. Empowering mid-level staff to make decisions and engaging with the Cabinet Office on pay should be part of the government's efforts to boost capacity. And while digitisation would provide a base on which to improve capability and streamline processes across the planning system, industry and government aren't working together closely enough on this priority area.

At a wider level, coordinated leadership is needed to align government and industry leaders around common outcomes. Regulatory bodies need to be aligned to manage dependencies across sectors, for example ensuring the ambitious housing programme is not frustrated by pressures on energy supply, transport networks, water supply or flood resilience. The new growth mandates may reduce siloed mentalities by requiring regulators to think more proportionally about the benefits of projects in terms of local growth and jobs. A willingness to compromise on process and the ability to bring together ministers and other key decision-makers regularly will help, particularly for larger projects.

Alongside the changes proposed in this revised NPPF, and wider reform programme measures to improve recruitment, retention, digitisation and culture change across the approvals system are needed.

Conclusion

The proposed revisions to the NPPF are positive, and growth oriented. But ensuring that these changes are able to deliver on the government's 1.5 million homes, and growth targets, it will need to better account for national direction.

Too often the effect of national planning policy is hamstrung by ad-hoc and misaligned local decision making. The current drive for planning reform is an opportunity to address this issue.

Alongside reform to tools like the NPPF, culture change and a commitment to improved productivity via digitisation at the planning inspectorate and other bodies is also required.