

# RTPI response to Consultation on operational reforms to Nationally Significant Infrastructure Project (NSIP) consenting process

September 2023

This is the Royal Town Planning Institute response to the Department for Levelling Up, Housing and Communities' consultation on the NSIP consenting process in England. The consultation can be found [here](#).

## About the RTPI

The RTPI champions the power of planning in creating sustainable, prosperous places and vibrant communities. We have over 27,000 members in the private, public, academic and voluntary sectors. Using our expertise and research we bring evidence and thought leadership to shape planning policies and thinking, putting the profession at the heart of society's big debates. We set the standards of planning education and professional behaviour that give our members, wherever they work in the world, a unique ability to meet complex economic, social environmental and cultural challenges.

## Strengthening the role of pre-application and ensure consultation is effective and proportionate

### 1. Do you support the proposal for a new and chargeable pre-application service from the Planning Inspectorate?

Overall, we support the principle of enhancing pre-application services to help facilitate more effective and efficient pre-application project development and engagement, examinations and decision-making. A more proactive, collaborative approach during pre-application can help identify and resolve issues early, minimise risks during examination, and create greater certainty for all parties.

However, it is unclear how the pre-application service will deliver section 51 advice to parties other than the applicant. We would welcome clarification as to how section 51 advice will continue to be provided to all interested parties.

**2a. Do you agree with the 3 levels of service offered?**

The new tiered structure seems a pragmatic way of tailoring pre-application support according to project complexity and applicants' needs. We would emphasise the importance of proportionality, fairness, and flexibility across the tiers.

**b. If you are an applicant, which of the 3 tiers of service would you be most likely to use and for how many projects?**

No comment.

**3. Would having the flexibility to change subscriptions as a project progresses through pre-application be important to you?**

Yes, having the flexibility to upgrade or downgrade between the pre-application tiers as a project evolves and its needs change would be beneficial. This avoids applicants being locked into an inappropriate tier and service level.

**4. To what extent do you agree that the overall proposals for merits and procedural advice will enable the policy objective to be met?**

We agree that enabling PINS to provide more proactive, merits-based advice could help deliver the policy objective of making pre-application more effective. Early, impartial advice on potential examination issues from their professional expertise could prompt more focused engagement between applicants and stakeholders. However, advice must remain without prejudice and clear communication of what PINS can and cannot advise upon is essential.

We would highlight that the efficacy of pre-application advice will be limited if up to date NPS with a spatial element are not in place. We are also concerned that these proposals will require significant additional expertise and resource from PINS, and it will be difficult to recruit additional qualified staff even with additional funding for PINS due to national shortages of qualified planners and other built environment, legal and environmental professions.

**5. Do you have any specific comments on the proposals in the Table above?**

No comment.

**6. Do you agree with the proposed changes to the consolidated list of statutory consultees outline above?**

Yes, we agree with the amendments to the list of prescribed bodies proposed. Adding 'Neighbourhood Planning or Development Groups' will help deepen community engagement in the process, and adding the Office for Health Improvement and Disparities will enable fuller consideration of scheme impacts.

**7. Are there any other amendments to the current consolidated list outlined in table 2.1 that you think should be made?**

We recommend adding Active Travel England and strategic planning bodies where relevant.



## **8. Do you support the proposed introduction of an early ‘adequacy of consultation’ milestone?**

Yes, assessing and confirming the adequacy of proposed consultation arrangements at an early stage should help ensure engagement is proportionate, effective, and undertaken efficiently, while still meeting statutory requirements.

Updated guidance on effective consultation practices is welcomed, informed by existing good practice and input from local authorities.

Setting an expectation for applicants to use independent community liaison chairs/forums where appropriate is welcomed. Independent liaison chairs/forums provide a neutral platform for dialogue between developers and communities, which can facilitate more open, informed and constructive engagement.

## **9. Are there any additional factors that you think the early ‘adequacy of consultation’ milestone should consider?**

The milestone should consider principles for engagement after the DCO is granted on implementation. Adequate engagement throughout the delivery of projects, particularly when changes are needed, is crucial.

We consider that the adequacy of consultation milestone should be designed to align with the recently proposed best practice principles for engagement in onshore wind projects ([DESENZ, 2023](#)), which stipulates that developers should:

- Plan their engagement, but also design and develop their plan for engagement alongside the community and in response to feedback;
- Engage with the community as early as possible and be transparent about their proposal;
- Think carefully about the characteristics of the potentially affected local community, recognising that every community is different, and taking identifiable steps to reach as many people in that community as possible;
- Use a variety of engagement methods to gather feedback, ranging from traditional in-person methods to digital and online platforms, to innovative community outreach techniques; and
- Plan for on-going engagement across the lifetime of the project.

## **10. What are the main reasons for consulting with communities multiple times during the lifetime of an NSIP application? (see table) Are there any other factors that play a part in multiple consultations seen to be required by developers?**

We identify and select the following options from the table:

- It is challenging to get the right level of information from consultations.
- The age of the National Policy Statements means more consultation is needed than before.
- It is the main way to update a community on changes that are made to a project.
- It is hard to engage with the correct communities.
- It is a means to mitigate legal challenge for the project.



- It is part of how to build enthusiasm for a project over time.
- It is a helpful way to develop the project.

Communities can provide locally specific information and knowledge that improves project design, and post-consent engagement on matters such as detailed design, hours of working, and siting of working is important for successful delivery.

Understanding and addressing community concerns early in the process can help avoid costly delays produced by opposition later in the process, and providing clarity for communities on proposals and channels for feedback reduces misinformation and speculation about projects.

## **11. Are there any other measures you think that government could take to ensure consultation requirements are proportionate to the scale and likely impact of a project?**

Although the measures proposed to improve consultation are positive, the RTPI would be interested in discussing further steps that Government could take to ensure major project's consultation requirements are proportionate, create a more level playing field between applicants and communities and reduce the delays and costs associated with local opposition.

For example, a new, independent national engagement body (of the kind described in the [Institute for Government's](#) 'How to transform infrastructure decision making in the UK' report, modelled after France's Commission Nationale du Débat Public) or a new public framework of engagement consultancies could be introduced to give an informed view of the level of consultation major projects require and take greater responsibility for the delivery of their consultation processes.

Participatory approaches these operators would employ are likely to: help the public to access impartial, expert advice and engage more effectively with NSIP applications; identify, mediate and resolve issues quicker and earlier; and secure greater public buy-in for major projects with due respect to reasonable objections. Project developers and decision-makers could also benefit from access to valuable local insights that can be used to strengthen projects from inception to completion and beyond.

A systemic approach to enabling meaningful participation in major projects could also support system-wide improvements to the NSIP regime by focusing and developing public engagement expertise, enabling greater coordination across projects, creating economies of scale and impose less political and financial costs on the government and project developers. This cannot be said of more extreme policy options – e.g. to centrally determine the appropriate levels of proportionality on case-by-case basis; imposing blunt thresholds based on measures of project size or complexity without regard for public perceptions of their impact; or by renegotiating international treaties to weaken consultation requirements – or of lighter touch reforms like updating guidance or promoting best practice.



## Operational reform to support faster and more proportionate examinations

### **12. To what extent do you agree with the proposal to remove the prohibition on an Inspector who has given section 51 advice during the pre-application stage from then being appointed to examine the application, either as part of a panel or a single person?**

We agree with allowing an Inspector who has given section 51 advice during the pre-application stage to examine the application. In the Town and Country Planning regime, planning officers routinely provide pre-application advice to shape proposals, before later being involved in determining the application. Their professional training and ethical codes provide safeguards against pre-determination. This probity must be ensured if this proposal is to be brought into effect.

Allowing the same Inspector to provide pre-application advice and examine the case provides continuity in the process and builds deeper understanding of the project, supporting effective examinations. With appropriate codes of conduct in place, concerns over pre-determination or bias should be capable of being limited, but there must be transparency and access for advice for all at the pre-application stage, not just for the applicant as always intended by section 51.

### **13. To what extent do you agree that it would lead to an improvement in the process if more detail was required to be submitted at the relevant representation stage?**

Requiring more detail in representations from statutory consultees and other stakeholders at an earlier stage will aid in identifying principal issues and planning focused and proportionate examinations. However, it is important to caveat that not all key issues can be identified at an early stage, as projects, technology, and the contexts for projects usually evolve throughout the process. For example, wind turbine technology might progress over the life of a project, which may present a need to adjust the size and location of onshore connecting infrastructure (Clifford and Morphet, 2023). Crucially, consultees and stakeholders must be properly funded and resourced to undertake this work, which we discuss in Chapter 7 of this consultation response.

### **14. To what extent do you agree that providing the Examining Authority with the discretion to set shorter notification periods will enable the delivery of examinations that are proportionate to the complexity and nature of the project but maintain the same quality of written evidence during examination?**

We agree that providing Examining Authorities discretion over notification periods could enable proportionate examinations, however this discretion needs to be exercised judiciously. Shorter periods may disadvantage some parties in preparing written evidence, particularly statutory bodies, and community groups with more limited resources. Examining Authorities should consider the capacity of groups who must respond to particular issues before determining appropriate notification periods. There is certainly potential to remove public notices and newspaper advertisements and rely more on the published timetable once all parties are registered and examination in accordance with the timetable and procedural decisions have commenced.



**15. To what extent do you agree that moving to digital handling of examination materials by default will improve the ability for all parties to be more efficient and responsive to examination deadlines?**

We agree that moving to digital handling of examination materials by default will improve the ability for all parties to be more efficient and responsive to examination deadlines. Digital document management enables more effective searching, cross-referencing, and version control. This supports a more robust examination process. Transitioning to digital-by-default should be accompanied by guidance to ensure accessibility for all parties and any reasonable accommodations facilitated and enabled as required.

**16. To what extent do you agree that the submission of ‘planning data’ will provide a valuable addition as a means of submitting information to the Planning Inspectorate?**

We agree that requiring data in accessible, machine-readable formats alongside printed reports and plans would make information more usable by PINS and stakeholders.

**17. Are there any other areas in the application process which you consider would benefit from becoming ‘digitalised’?**

Digital engagement methods are already widely utilised by promoters, but it is worth setting an expectation for this in guidance. RTPI research ([The Future of Engagement, 2020](#)) recommends using digital tools alongside face-to-face meetings and other traditional methods of consultation. Effective marketing of digital consultation is essential to maximise reach.

A key part of digital engagement and consultation is to maintain a digital register of community comments and the applicant’s response to those comments, so the community can track how specific issues have been addressed over time. These registers should be in a format that is easily searchable.

Application documents should be available online throughout the life of the project, including post-consent.

We encourage ensuring data relevant for strategic infrastructure planning is available in a standard format that can be easily processed and analysed to enable more effective planning across local authority boundaries.

## **Establishing a fast-track route to consent**

**18. To what extent do you agree that projects wishing to proceed through the fast track route to consent should be required to use the enhanced pre-application service, which is designed to support applicants to meet the fast track quality standard?**

Yes, the success of the new fast track route will depend on the ability of all interested parties to engage effectively in the pre-application process. The fast-track route would incentivise applicants and stakeholders to identify and address issues during the pre-application stage to enable them to undergo the rest of the consenting process more quickly.



**19. To what extent do you consider the proposed fast track quality standard will be effective in identifying applications that are capable of being assessed in a shorter timescale?**

The proposed fast track quality standard provides a sensible framework for identifying projects potentially suited to shorter NSIP examinations in which substantive issues have been aired and resolved as far as possible in pre-application; although projects that are inherently less complex, use little or no compulsory acquisition and have a low level of opposition should also be considered appropriate for fast track for example.

However, to ensure delivery of post-consent conditions for fast-track projects and to ensure effective mitigation of environmental impacts, applicants should demonstrate a plan for appropriate compliance processes, outcome tracking, and commitment reporting during construction and operations.

**20. On each criteria within the fast track quality standard, please select from the options set out in the table below and give your reasoning and additional comments in the accompanying text boxes. Please also include any additional criteria that you would propose including within the fast track quality standard?**

1. Principal areas of disagreement: **Strongly agree**. However the points of potential disagreement must address the construction and operational effects and not just land use matters.

2a. Fast track programme document: **Strongly agree**. The Fast Track Programme Document should extend beyond project design to also describe the level of detail to be applied to the construction methodologies and environmental management plan to avoid, mitigate and monitor environmental performance.

2b(i). Include fast track intention in consultation material: **Agree**. It provides a basis for other stakeholders to assign resources to the consent process.

2b(ii). Formal agreement to use enhanced pre-application: **Disagree**. Will the action of putting in place a 'formal agreement' take unnecessary time when failure to deliver the specified documentation to the necessary quality would automatically disbar the applicant from the fast-track process. Hence this seems like an unnecessary activity.

2b(iii). Publicise fast track programme: **Agree**. The transparency of associated dependencies will be critical to the successful achievement of the timetable across all interested parties.

2b(iv) Provide evidence at submission of 2a – 2c: **Disagree**. The provision of evidence accompanying the application needs clarity since it may simply be a signposting exercise or give rise to the duplication of materials presented elsewhere or require additional supporting evidence to the EOR.

3. Regard to advice: **Disagree**. This requirement could give rise to duplication of materials and further clarity should be provided.



**21. To what extent do you agree that the proposals for setting the fast track examination timetable strike the right balance between certainty and flexibility to handle a change in circumstance?**

The proposed fast track examination timetable strikes a reasonable balance between certainty and flexibility. Allowing Examining Authorities to advise on extending the 4-month examination window where issues emerge shows sufficient flexibility. However, the basis on which extensions would be permitted requires clarification and should be the exception.

## **Reviewing the processes for making changes to Development Consent Orders post consent**

**22. To what extent do you agree that there is a need for new guidance on which application route proposed changes should undergo?**

We agree that there is a need for new guidance on which application route proposed changes should undergo. Better facilitation of post-consent changes will improve the speed and quality of delivery, and greater clarity on which route applicants should take is welcomed as long as it encourages an effective and proportionate process, with the presumption for minimising lengthy process.

**23. In addition, what topics should new guidance cover that would help to inform decisions on whether a proposed change should be considered as material or non-material?**

The materiality of changes should be subject to a high-level assessment across a set of standard environmental topics including consideration of an effect upon cumulative effects and the need to vary the Environmental Management Plan.

Separately, there is a need to update the guidance on community engagement in post-consent changes. The 2015 guidance discusses consultation in little detail, with no expectations set for how applicants should conduct engagement for post-consent changes. Given that post-consent changes do often significantly alter schemes and their impacts, clearer guidance on engagement should be included for all to benefit and provide certainty.

**24. To what extent do you support the proposal to introduce a statutory timeframe for non-material change applications? What do you consider is a reasonable timeframe for determining non-material applications?**

We strongly support introducing a statutory timeframe for non-material change applications to streamline delivery. This would reduce uncertainty and risk for developers about using non-material changes, encouraging them to make non-material amendments rather than delivering poorer proposals or finding different routes to consenting, which will both speed up delivery and reduce the burden on all parties involved.

We recommend a statutory timeframe of 8-10 weeks maximum for determining non-material amendment applications for NSIPs.

A 6-8 week period risks being too constrained for meaningful engagement, participation and assessment of proposals, even if they are deemed non-material. However, stretching beyond 10-12 weeks seems disproportionate. 8-10 weeks therefore strikes an appropriate balance, allowing sufficient time for due process without undue delay. This should enable thorough



consideration and input from stakeholders, while still responding efficiently given the limited nature of changes and should be advised to be proportionate and timely in any event.

## Resourcing the Planning Inspectorate and updating existing fees

### **25. Taking account of the description of the services in section 2.2.1 to what extent do you believe a cost-recoverable pre-application service will represent value for money in supporting applicants to deliver higher quality applications with minimal residual issues at submission?**

We agree that a cost-recoverable pre-application service is appropriate, but this must be linked to quality and performance. This is an essential part of the Town and Country Planning regime and is highly useful in addressing issues at an early stage. The NSIP regime should have an equivalent paid pre-application service that facilitates the delivery of higher quality applications.

### **26. To what extent do you agree with the proposal to charge an overall fee (appropriate to the tier of service that will cover the provision of the service) for a fixed period?**

We agree that charging an overall fee for a fixed period is the most appropriate way to charge for PINS' pre-application services as long as essential service levels are ensured and delivered.

### **27. The government has set out an objective to move to full cost recovery for the Planning Act 2008 consenting process. To what extent do you support the proposal to support the Planning Inspectorate to better resource their statutory work on consenting by reviewing and updating existing fees, and introducing additional fee points?**

We support updated and additional fees for PINS' services in the consenting process. PINS already provides a direct service to applicants and would provide an additional level of services under the proposals, which will support applicants to deliver higher quality applications. Ensuring that these services achieve the aim of increasing speed and certainty in the DCO process requires PINS to be properly funded, resourced and skilled. Achieving cost recovery for the services it provides is critical.

However, it is important to note that PINS' performance will be critical to the success of the reforms. Although enabling PINS to achieve cost recovery will help make the system financially sustainable over time, in the near term, PINS must ensure it has enough experienced planners and other professional staff with adequate and relevant experience and expertise to support the reforms. As part of the broader effort needed to recruit and retain qualified planners and other professionals across the planning system, the government needs a clear strategy to provide PINS with adequate resources. The focus must be on well informed and resourced positive outcomes not just on cost recovery. PINS must be part of the forthcoming Comprehensive Planning Skills Review.

### **28. To what extent do you support the proposal to review and update existing fees in relation to applications for non-material changes to achieve cost recovery and support consenting departments in handling these applications?**

We support reviewing and updating fees for non-material change applications to achieve cost recovery for consenting departments but on a performance and proportionate and timely basis.

**29. To what extent do you agree that the proposed review and update of existing fees and introduction of additional fee points will support the Planning Inspectorate to better resource their statutory work on consenting?**

We agree that reviewing and updating fees could help PINS resource its statutory consenting duties more effectively. However, as discussed in our answer to question 27, this will depend on PINS' ability to recruit and retain qualified planners in good time to respond to the anticipated workload associated with these reforms. We would welcome the opportunity to work with the government on a strategy to resource PINS.

**Strengthening performance of government's expert bodies****30. To what extent do you agree that defining key performance measures will help meet the policy objective of ensuring the delivery of credible cost-recoverable services?**

We agree that defining key performance measures could help ensure credible, cost-recoverable services from statutory consultees. However, metrics must focus on quality and outcomes and should be co-designed with statutory bodies to ensure they are realistic and meaningful and properly scoped and aimed at delivering the essential national infrastructure and good outcomes needed. Reporting should be streamlined, and data should be transparent and accessible.

**31. Do you agree with the principles we expect to base performance monitoring arrangement on?**

(i). Be outcome and not output focussed to ensure better planning outcomes

Strongly Agree. Outcomes should be based on environmental rather than administrative outcomes as the objective should be to deliver quicker consents without compromising the environment.

(ii). Consider quality of customer service provision

Disagree. Statutory environmental body staff are usually committed to achieving satisfactory environmental outcomes and therefore would operate at a level of service that would not necessitate additional bureaucratic KPI.

(iii). Cover the provision of statutory and non-statutory advice provided by the specific prescribed bodies (outlined in section 7.2.2) through pre-application, pre-examination, Examination and Decision

Disagree – Resource constraints compromise the provision of non-statutory advice. The solution is more resource rather than an additional KPI.

(iv) Monitoring should be tailored to the context of each organisation

Strongly Agree – To monitor environmental rather than administrative outcomes would require different monitoring regimes that reflect the timescales over which such outcomes would become apparent on a project-by-project basis, hence some monitoring may involve say a five-year moving average score across a series of projects.

(v) Reporting should be timely, transparent, simple to understand, easily accessible and evolved over time

Strongly Agree. Reporting must have a purpose and be linked to change mechanisms either in the NSIP or statutory body processes and resources.

**32. We would like to monitor the quality of customer service provided, and the outcomes of that advice on applicant's progression through the system where practicable. Do you have any views on the most effective and efficient way to do this?**

No comment.

**33. To what extent do you support the proposal to enable specific statutory consultees to charge for the planning services they provide to applicants across the Development Consent Order application process?**

Statutory consultees must be better funded and resourced to provide regulatory services with respect to major infrastructure applications. We recognise that enabling consultees to charge applicants for their services is a sensible way to improve performance and timeliness as long as these are resourced and delivered collaboratively and appropriately. If such a charging system is introduced, it is reasonable to introduce more detailed performance monitoring arrangements for expert bodies which address planning outcomes and quality of engagement with applicants and communities.

**34. To what extent do you agree with the key principles of the proposed charging system?**

(i). Initially limit the ability to charge to the organisations listed in table 7.1

Disagree. As the constrained public purse should not subsidise development activities and the true cost of development should be made transparent, then it is unclear why there should be any limit on the public bodies able to charge for services. Local authorities should be able to charge for services in addition to the Innovation and Capacity funding which is a competitive source of funds rather than reflecting the level of service a developer may wish to fund.

(ii). Recover costs for non-statutory and statutory services provided throughout Pre-application, Pre-examination, Examination and Post-Decision

Strongly Agree. With the long overdue focus on the delivery of environmental commitments made at the consent stage it would be logical to extend charging advice to address post-decision advice.

(iii) Setting charging schemes

Strongly Agree. As the level of technical expertise needed to provide high quality and proportionate advice will vary not only between statutory consultees, but also depending upon the environmental aspects on which advice is to be sought, so it is correct for each body to devise its own charging scheme.

**35. Do you have any comments on the scope and intended effect of the principles of the charging system?**

No comment.

**Improving engagement with local authorities and communities****36. Do you support the proposal to set out principles for Planning Performance Agreements in guidance?**

Setting out principles for PPAs in guidance is welcomed. We agree that the guidance should set expectations for applicants to seek to agree PPAs with local authorities early in the process that allow the local authority to meaningfully participate in the pre-application phase and at examination with the aim of minimising areas of disagreement. PPAs should set standards for planning outcomes, not just timelines, and should avoid sacrificing the quality of input for speed. We support PPAs including funding, where needed, for local authorities to procure technical advice to fully understand and test applicants' assessments.

However, PPAs should not serve as the default means of funding local authority engagement in the DCO process. A more efficient approach would be for local authorities who engage with DCOs to have the benefit of charging scales for their services, as in the Town and Country Planning Act regime. PPAs would then be used for particular complexity or volume of overlapping projects in a locality. PPAs often require time and resource to draft and could therefore unnecessarily extend the timelines particularly for simpler projects. A fees scale would also take the conflict out of discretionary resourcing.

**37. Do you have any further views on what the proposed principles should include?**

The principles for PPAs should also set the expectation of a strategy for community engagement, which should be developed with input from the local community including groups such as parish councils.

**38. To what extent do you agree that these proposals will result in more effective engagement between applicants and local communities for all applications?**

We welcome the proposed adequacy of consultation milestone and expectations around independent liaison chairs/forums as positive steps towards more effective engagement between applicants and communities. This could be supplemented by funding for communities to, as part of working with independent liaisons, identify and fund technical support and engage with statutory bodies.

However, the focus appears limited to pre-application and overlooks ongoing engagement needs post-consent. Consistent community liaison throughout projects would be beneficial. Guidance should establish the principles and key elements of post-consent public engagement, including a reporting mechanism to demonstrate how principal issues raised by local communities have been considered and addressed. Any delivery along these lines does need to avoid adding burdensome procedural steps and opportunity for challenge.

In answer to Question 11, we have suggested further models to enable meaningful public participation in the NSIP regime and create a more level playing field between applicants and



communities. We'd be interested in discussing these options further with Ministers and officials because community involvement from inception to completion is especially important under the NSIP regime, where principle and alternatives cannot readily be contested after application acceptance. An independent national body overseeing engagement, as previously suggested, could empower communities more effectively and comprehensively, not just the motivated and self-selecting few.

## Building the skills needed to support infrastructure delivery

### **39. Do you face any challenges in recruiting the following professions? Please complete the table below and give reasons.**

No comment.

### **40. Are there any other specific sectors (as identified above) that currently face challenges in recruiting? If so, please state which ones and give reasons why.**

Local authorities experience difficulty in hiring and retaining planners. 58% of local authorities struggled to hire as many planners as they wanted to, the highest percentage for any profession ([Local Government Association, 2022](#)). This is primarily due to a decline in remuneration for local authority planners over the last 20 years and the expansion of private consultancies and developers that can offer more competitive pay.

Many local authority planning departments therefore lack sufficient resourcing and skill to effectively engage with the DCO process. There is a limited pool of planners with DCO experience who tend to move between local authorities working on different NSIPs as needed, preventing planning departments from building and sustaining local expertise.

### **41. Do you have any ideas for or examples of successful programmes to develop new skills in a specific sector that the government should consider in developing further interventions?**

We have welcomed the Planning Skills Delivery Fund, further Innovation and Capacity Funding, and funding to Public Practice and the RTPI Future Planners bursary scheme.

Planning Agencies would be best placed to maximise the benefits of this new skills funding and meet the growing demand for planners who can support the DCO process. A Planning Agency is a voluntary shared services model for local planning authorities to bring their planning teams together, pooling resources, offering multidisciplinary support, and developing expertise and capacity at a sub-regional level ([RTPI, 2022](#)). In areas with a high concentration of NSIPs, Planning Agencies could develop dedicated teams to engage with DCOs, allowing regions to build and sustain local nationally significant infrastructure planning expertise.



## Updates to the national infrastructure planning guidance

### **42. To what extent do you agree that updated guidance on the matters outlined in this consultation will support the Nationally Significant Infrastructure Project reforms?**

Updated guidance on the pre-application and examination stages of the process, making changes to DCOs, the proposed fast-track consent route, and community engagement expectations will provide greater clarity to all parties participating in the process and enable more effective implementation of the proposed reforms.

We support introducing new guidance on fees for pre-application advice and post-consent changes. While additional guidance on the principles for PPAs with local authorities is supported, we believe PPAs should not serve as the default funding arrangement for local authority services in the DCO process, as stated above.

### **43. Do you support a move towards a format for guidance that has a similar format to the national planning practice guidance?**

Adapting the format of NSIP guidance to align with the format of the NPPG is supported. In addition to the main policy document of the NPPG, guidance is also available grouped by category and date of publication. Within each guidance section, each paragraph has an individual reference and revision date. Applying this approach to NSIP guidance would be helpful.

### **44. Are there any other guidance updates you think are needed to support the Nationally Significant Infrastructure Project reforms?**

There is an absence of guidance on implementation, monitoring and enforcement of environmental management plans and the conditions associated with the consent.

As we explain in our response to question 9, we recommend that the recently proposed best practice principles for engagement in onshore wind projects be adapted and included in NSIP guidance on engagement.