

## Planning and Infrastructure Bill Committee: Written evidence

April 2024

### Summary

1. The Aldersgate Group is an alliance of major businesses, academic institutions and civil society organisations which drives action for a competitive and environmentally sustainable UK economy.<sup>1</sup> Our corporate members represent all major sectors of the economy, and include Associated British Ports, Aviva Investors, BT, CEMEX, the John Lewis Partnership, National Grid, Crown Estate, Nestlé, Siemens, SUEZ, Tesco, and Willmott Dixon. Aldersgate Group members believe that ambitious environmental policies make clear economic sense for the UK, and we work closely with members when developing our independent policy positions.
2. The Planning and Infrastructure Bill can be a powerful delivery vehicle to build homes and critical energy infrastructure while accelerating nature restoration. To realise this vision, it is essential that the Bill's design and impact are improved in four critical ways:
  - Introduce a legal duty for planning authorities to **require policies and decisions to contribute towards our climate and environmental ambitions**.
  - Urgently provide further details in Part 3 of the Bill on how **Environmental Development Plans** will make sure that development and nature are delivered hand in hand. This should include respecting the mitigation hierarchy, following scientific advice, and ensuring benefits substantially outweigh harm.
  - Ensure that Natural England and all lead regulators, such as local and planning authorities, are **efficiently resourced** to carry out the duties set out in the Bill. This needs to be accompanied by support for the **development of their skills base**.
  - Provide **clarity on how the changes in the Bill will overlap with other spatial strategies and plans**, such as spatial development strategies, local nature recovery strategies and biodiversity net gain.
3. Implementing these changes will also provide clarity for the private sector and ensure that planning decisions are aligned with our climate and environmental ambitions. Joining up these two agendas will be critical for supporting the rollout of critical energy infrastructure and delivering the government's clean energy mission.

### Incorporate climate and nature ambitions

4. Aldersgate Group welcomes the fact that the Bill attempts to streamline the planning process. This will be important to modernise the planning system and deliver a resilient, low carbon future. We recognise that the Bill intends to enable a faster and more certain consenting process for critical infrastructure, as well as improving certainty and decision-making in the planning system; these are important steps forward to ensure that we can deliver the infrastructure we need to meet national climate commitments and provide clarity for individual projects.

5. In particular, updating the National Policy Statements every five years will ensure that the policy framework around critical infrastructure is sound and that policies are keeping pace with delivery. Additionally, the reintroduction of spatial development strategies will help to bring forward strategic planning across the whole of England, and should help provide clarity on what developments will be important in particular areas.
6. **If designed well, the planning system can be a powerful enabler to deliver the housing, energy infrastructure and environmental benefits we need.** The Planning and Infrastructure Bill is a key, but not the only, mechanism that the government is implementing to deliver on this vision. There are also important changes under way related to environmental impact assessments, grid connections, and land use planning, to name a few. To speed up the planning system and deliver for nature, these components will need to work together. After all, as the National Planning Policy Framework sets out, “The purpose of the planning system is to contribute to the achievement of sustainable development, including the provision of homes, commercial development and supporting infrastructure in a sustainable manner.”<sup>1</sup> The recommendations in this submission are intended to realise this vision.
7. For planning decisions to be made in a way which enables the UK to meet its climate and environmental targets, it is vital that these targets are explicitly incorporated into the Bill. We recommend this is done by placing a legal duty on planning authorities to **require planning policies and decisions to be consistent with reducing greenhouse gas emissions and delivering nature restoration** within the relevant area.
8. This will align planning policies and decisions with the UK’s net zero and environmental objectives as specified in 2008 Climate Change Act and 2021 Environment Act, and make sure that the planning system considers the delivery of these alongside delivering housing. Explicitly putting this in the Bill will enable planners and developers to consider these aspects early in proposals and maximise the additional benefits that development can bring.

### Strengthen environmental protections and EDPs

9. A critical component to achieve the government’s stated objective of delivering a ‘win-win’ for nature and the economy, accelerating economic and environmental growth<sup>2</sup>, is to ensure that the proposed Environmental Development Plans (EDPs) are effective in practice and that safeguards are put in place to protect critical habitats and landscapes.
10. In its current form, the Bill provides a vision for how this can be achieved; however, the lack of detail around the EDPs and where they sit within the wider planning system introduces significant uncertainty over whether environmental protections will

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<sup>1</sup> Ministry of Housing, Communities and Local Government (December 2024) National Planning Policy Framework

<sup>2</sup> Ministry of Housing, Communities and Local Government (15 December 2024) *Planning proposals get Britain building and turn the tide on nature’s decline*

be maintained. **We strongly urge the government to address this lack of detail with urgency**, so that these concerns are alleviated and the link between delivering infrastructure and housing and protecting the natural environment becomes clearer. To remove this uncertainty, it will be critical that amendments are brought forward to crystallise key elements of EDPs.

11. In particular, the Bill should set out that **EDPs will be created following scientific evidence** and utilising the **mitigation hierarchy**. It should explicitly provide that **benefits need to outweigh harm**, and that **benefits are delivered upfront** - especially in the case of irreplaceable and significant damage. Including these provisions in the Bill will provide clarity on the nature of EDPs and how environmental improvements will be delivered hand in hand with development. Leaving the details entirely to secondary legislation risks implementation being weakened and introduces uncertainty not just for projects, but also for the wider planning system and environmental protection.
12. **The overall improvement test** is welcome, although the current wording is not sufficiently strong to ensure that there is in fact an overall improvement, which is an essential component of ensuring that developments are sustainable and that there is no significant damage to the natural environment. We urge the government to strengthen the wording in Clause 55(4) to state that “An EDP passes the overall improvement test if the conservation measures are likely to be sufficient to *significantly and measurably* to outweigh the negative effect” (addition in italics). This will be vital to provide reassurance that the test is meaningful and will support nature restoration. Otherwise, there is a risk that improvements are undeliverable and not enough to outweigh the environmental damage caused.
13. Additionally, it will be important that EDPs are adequately consulted on. **Clause 54 should be expanded** to enable additional stakeholders to be consulted as part of drafting an EDP. Non-government organisations and other voices can often provide important additional knowledge that will support the delivery of critical infrastructure, nature improvements and housing.
14. Finally, it is essential to **recognise that the introduction of EDPs would introduce a completely new system for developers, planners, ecologists and broader communities**. It will be crucial for the success of Part 3 of the Bill that there is enough time for public consultation and engagement with the entire planning system on how we can secure environmental improvements through new mechanisms such as EDPs.

### Efficiently resourcing regulators and local authorities

15. The government’s ambition for speeding up housing development and its commitment to delivering 150 major projects are welcome, but there must be a relative increase in resourcing to address the pressure on resource-constrained local authorities and regulators. This will make sure that the reformed system is functioning well as reforms are introduced, and that the organisations concerned are able to suitably scrutinise proposals. Environmental regulators, such as Natural England, also have a responsibility in helping the UK meet climate and environmental targets. To fulfil these objectives effectively alongside the new responsibilities set out

in the Bill, they will likely need increased financial, administrative, and human resources, particularly to secure relevant expertise.

16. Government has stated in guidance documents that it will “sufficiently” resource Natural England to carry out its expanding duties to either administer or implement EDPs. However, we would recommend providing assurances on funding by **including wording in the Bill to recognise the importance of regulators, planning authorities and local authorities being efficiently resourced to carry out their respective duties under the Bill and the wider planning system.**<sup>3</sup> Not doing so risks either slowing down development or putting nature at greater risk.
17. The resourcing strain is already becoming apparent. A freedom of information request to Natural England highlighted that between 2022-2023, Natural England failed to meet deadlines for 17.1% of NSIP applications due to under-resourcing and workload issues in over a fifth of cases.<sup>4</sup> We expect this would be exacerbated and the protection of nature weakened if resourcing is left vulnerable to future departmental budget cuts.
18. There are wider considerations for the UK with regards to skills capacity and availability as the UK meets the growing appetite for housebuilding and infrastructure development that allows for nature restoration. **Ecology and planning skills are cited as particular areas of concern amongst energy developers, local authorities and environmental NGOs.** Remuneration for planners is also declining in real terms and up to a quarter of planners are estimated to have left the public sector since 2013.<sup>5</sup> It is therefore important to provide enough financial resources so that local authorities and regulators are better able to attract and retain the skills they need to support the vision of the Planning and Infrastructure Bill.
19. Additionally, government should **improve access to centralised or regional hubs and relevant expertise** to support upskilling, help reduce uncertainty around timescales for applications, and improve community engagement.<sup>6</sup> This will be particularly important for local authorities and local communities that may not have had a history of particular infrastructure projects being delivered in their area.

### Clarify spatial elements and community considerations

20. As mentioned previously, we welcome the reintroduction of spatial development strategies across England. These will be essential components in securing alignment across policy areas and identifying the need for key infrastructure and housing in local areas.
21. To realise its role, it is critical that the Planning and Infrastructure Bill, and its associated documents, **clearly outline how its ambitions and provisions interact**

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<sup>3</sup> Minister of Housing, Communities and Local Government (2025), [Guide to the Planning and Infrastructure Bill](#)

<sup>4</sup> Wildlife and Countryside Link (2025), [Planning Reform Working Paper: Streamlining Infrastructure Planning: Link response](#)

<sup>5</sup> RTPi (2023), [State of the Profession 2023](#).

<sup>6</sup> Aldersgate Group, Renewable UK, CPRE (2024), [Electric Dreams: how the planning system can help deliver the UK's low-carbon energy](#)

**with concurrent UK policy developments** to foster investor confidence, ensure local transparency, and minimise unintended consequences. It will be essential to clarify how the measures introduced in the Bill fit within the wider planning system, and that simultaneous reforms to agriculture, infrastructure, trade, and business policies do not introduce complexities or overlaps.

22. This can be done by producing a document which maps out relevant and overlapping policies that can affect infrastructure and housing delivery, such as the Strategic Spatial Energy Plan (SSEP), Centralised Strategic Network Plan (CSNP), Regional Energy System Plans (RESPs), Land Use Framework (LUF), and Local Nature Recovery Strategies. These strategies are spatially focused, and currently it is not clear where there are overlaps and how potential tensions may be resolved. This would be a welcome accompaniment to the Bill and the development of other related measures, such as Nature Restoration Fund and EDPs. It would provide greater clarity on timelines and decision-making across these interconnected initiatives, and this would help deliver the UK's climate and nature targets effectively.
23. For example, NESO is leading efforts to develop the SSEP by 2026 and CSNP by 2027, while implementing RESPs to address energy distribution needs.<sup>7</sup> It will be important how these efforts will be coordinated alongside the introduction of LUF to ensure success in balancing development with environmental restoration.
24. From an environmental perspective, it is particularly critical that **further details on the development of Environmental Outcome Reports (EORs)** are provided alongside the design of EDPs in the Bill. These two measures are intrinsically linked, and both are critical to a more strategic approach to development and nature restoration. Without it, it is difficult to assess how current environmental protections will be maintained.
25. Finally, high quality engagement between developers and local communities is important to deliver better outcomes through the planning system, as well as to secure better outcomes for host communities. As set out in our recent report with RenewableUK and CPRE, the countryside charity, **we support the recommendations from the Independent Review of Net Zero<sup>8</sup>, where community benefits are seen as a vehicle to deliver local net zero and environmental projects. The measures in the Bill must be accompanied by higher quality engagement**, supported through good practice and guidance for developers. Local communities also need accessible advice on nature and climate positive options, and the proposed funds could provide benefits to host communities aligned with energy efficiency, decarbonisation and environmental improvement.<sup>9</sup>

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<sup>7</sup> Aldersgate Group, Renewable UK, CPRE (2024), [Electric Dreams: how the planning system can help deliver the UK's low-carbon energy](#)

<sup>8</sup> Rt Hon Chris Skidmore for the Department for Energy Security and Net Zero (2022), [Review of Net Zero](#)

<sup>9</sup> Aldersgate Group, Renewable UK, CPRE (2024), [Electric Dreams: how the planning system can help deliver the UK's low-carbon energy](#)