

29 April 2025

Dear Public Bill Committee,

I am writing to you on behalf of the Association for Consultancy and Engineering (ACE) and the Environmental Industries Commission (EIC). ACE and EIC represent the views of over 400 members in the UK's consultancy and engineering sectors. Our members comprise of UK businesses of all sizes, from global operations to SMEs. Our members employ over 420,000 people, contributing more than £15 billion to the UK economy. The projects they deliver actively contribute over £570 billion a year of GVA.

The Planning and Infrastructure Bill presents a unique opportunity to transform the system which enables the delivery of critical national infrastructure and housing.

There is much to support in the Bill including:

Strategic planning

We welcome the introduction of Spatial Development Strategies. The Bill needs to ensure that they are aligned with government proposals for national spatial strategies for land use, energy and transport to reflect national priorities. Planning decision makers need to have regard to these priorities in addition to local interests.

Spatial approaches are essential to enable prioritisation and the delivery of project co-benefits, such as the reuse of heat from data centres for strategic heat networks or using nature-based solutions to mitigate flooding and urban heat islands. Spatial strategies will also enable a circular economy approach to national resource management – this is already happening where ports are being redeveloped as renewable energy infrastructure. This is more efficient than building on greenfield sites and also supports retraining and redeployment of skills.

Speeding up planning decisions

We welcome the proposals designed to make planning decisions faster. It is important that this change supports strategic outcomes, including planning decisions in favour of sustainable development of critical national infrastructure and housing. Decisions need to balance local and national benefits.

New planning fee proposals

Enabling local planning authorities to set their own fees is a positive step. We note, however, that there are significant capacity and skills gaps within planning departments. It is important to ensure that the new system both sufficiently plugs capacity gaps and supports upskilling.

This is particularly pertinent for the delivery of environmentally beneficial solutions, which tend to be more complicated and therefore require sufficient capacity as well as specialist skills. ACE and EIC members have seen instances of planning officers rejecting developer

proposals that would improve resource efficiency and climate resilience due to their lack of familiarity and knowledge. We welcome the Bill's inclusion of mandatory training for planning committee members. This should encompass training and education in climate, nature and circular economy.

However, we have a number of significant concerns:

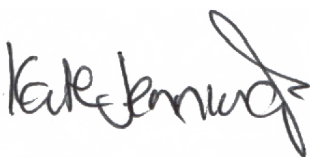
Nature Fund

The nature fund should be welcomed and has the potential to resolve issues such as the handling of nutrient neutrality. However, the proposals were rushed with no consultation. This is too important to get wrong. As drafted, the Bill risks failing developers and the environment. The approach to Environmental Delivery Plans and the fund need to be designed carefully, in full consultation with industry so that they work and do not conflict with BNG and nature markets. We recommend including the key principles of polluter pays and mitigation hierarchy in the Bill and leaving the detailed design for full consultation and piloting.

Compulsory purchase reform

We note the provisions on hope value and understand the urgent need to deliver more schemes that benefit communities, including affordable and/or social housing. However, it is essential that these provisions do not lead to unintended consequences. The compulsory purchase scheme needs to be flexible to enable support for development. Development which is critical for overall public good and economic growth often involves local opposition, negotiation and legal challenges, resulting in delays – getting this right is important for both landowners, local communities and the beneficiaries of the proposed development. Project developers need the flexibility to offer appropriate compensation to enable timely development. If CPO values are too low or the approach inflexible there is a risk that the changes could have the opposite effect to that intended in the Bill and represent a false economy – they would not make development quicker and the long-term costs resulting from delays due to objections could exceed the initial savings. This is particularly true for major infrastructure development where for example in Australia we understand that energy schemes sometimes involve annual rental approaches to pylon development rather than land purchase.

Yours sincerely,



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