

London Chamber of Commerce and Industry Written Evidence Submission on the Planning and Infrastructure Bill

30 April 2025

1. Introduction

The London Chamber of Commerce and Industry (LCCI) is the capital's largest independent business advocacy organisation, representing over 10,000 businesses. As a champion of London's global status as a premier destination for trade, investment, and business growth, LCCI works tirelessly to address the key challenges facing businesses. We engage proactively with policymakers, stakeholders, and local communities to ensure the success of London's businesses and, consequently, the UK economy.

In our response to the Planning and Infrastructure Bill, we examine its potential to modernise the planning system and deliver efficient, integrated infrastructure solutions. Building on insights gained from our members, our analysis emphasises the need for greater clarity, streamlined processes, and robust long-term certainty within the planning regime.

2. Enhancing Strategic Planning and Legal Certainty

To maximise the effectiveness of the Bill's reforms, **LCCI recommends augmenting the current review provisions with procedural enhancements that emphasise predictability and proportionality.** Our recommendations are based on a thorough understanding of the challenges faced by businesses and are aimed at addressing these concerns effectively.

Recognising that infrastructure projects vary in scope and complexity, it is essential that review requirements are appropriately tailored. **We recommend exempting NPS documents addressing a single location or specific project from the standard multi-year review cycle.** This targeted approach would preserve the effectiveness of such policies and enhance overall stability for developers and investors.

Moreover, **LCCI urges the government to underpin the NPS review process with clear metrics, robust public engagement standards, and defined timetables.** These measures will ensure that infrastructure priorities are aligned with current economic, environmental, and technological developments while maintaining a stable and transparent planning environment.

By reinforcing technical foundations, the planning regime will become more responsive and resilient—providing the certainty needed to enable efficient delivery and support sustainable investment. These procedural enhancements can unlock significant private investment at an earlier stage by reducing delays and improving certainty around policy reviews. Faster national policy updates and a more predictable consenting environment would encourage developers and financial institutions to commit capital more rapidly, supporting the creation of direct and indirect jobs across the UK. In turn, accelerated delivery of strategic infrastructure

projects would generate positive multiplier effects—boosting local supply chains, stimulating business activity, and contributing to sustained GDP growth.

3. Modernising the Consent Process

The Bill introduces necessary improvements to reduce administrative delays and create a more efficient consenting regime. **LCCI recommends building on these provisions by introducing additional flexibility and clarity in several key areas.**

First, **the consenting process should allow for case-by-case adjustments.** This can be achieved by setting binding deadlines for statutory consultees and streamlining consultation protocols to ensure that all responses are received promptly. In line with this objective, we propose that the Bill be further amended to permit applicants to request modifications—or, in exceptional circumstances, the disapplication—of specific pre-application consultation requirements. Such adjustments would enable a more context-sensitive approach for nationally significant projects, better aligning the process with the pace needed for major infrastructure initiatives while preserving robust stakeholder engagement.

Furthermore, recognising that delays during the pre-examination phase can critically affect project delivery, **we suggest empowering the government to issue clear, binding directions to the Examining Authority.** Establishing defined deadlines for submissions, along with appropriate penalties for non-compliance, would help maintain momentum and further reduce decision-making delays.

Lastly, **we recommend a comprehensive review of redundant consent requirements to reduce fragmentation within the approval process.** For instance, the current system often requires separate permits for environmental, construction, and transport-related approvals, leading to unnecessary administrative burdens and delays. Consolidating these into a single, integrated authorisation mechanism can simplify the process for project promoters while ensuring that necessary regulatory safeguards are maintained.

These combined measures will make the consenting process more streamlined and predictable, supporting efficient project delivery and broader business growth. Streamlining the consent process and consolidating multiple permits into a single approval mechanism would shorten project timelines and reduce compliance costs. By cutting out redundant application layers and binding statutory deadlines, project viability will be improved—making infrastructure investments more attractive to a broader pool of investors.

4. Integrating Interdependent Consents

For projects requiring multiple interlinked approvals, coordinated decision-making is essential. **LCCI supports a joined-up approach that aligns consenting processes for both infrastructure and operational requirements—such as connectivity, network access, or airspace considerations.** This integration ensures that all necessary project elements are delivered simultaneously, reducing fragmentation and enhancing overall system functionality.

In addition, **we recommend that the Bill be strengthened by granting the Secretary of State discretionary powers during the examination phase.** Such powers would enable the modification of procedural rules when compliance with existing protocols poses an undue delay. By setting binding deadlines and clarifying procedural expectations, this measure would contribute to a more responsive and streamlined examination process, facilitating faster and more efficient delivery of project approvals.

Aligning interdependent consents would ensure that key infrastructure components come online together. This holistic delivery model maximises the value of each pound invested—supporting growth in high-value sectors such as advanced manufacturing, creative industries, and financial services. Coordinated approvals also reduce the risk of stranded assets and help secure end-to-end service provision (e.g. power, data, transport), which in turn enhances business confidence and underpins long-term locational decisions by multinational firms.

5. Institutional Oversight and Accountability

Robust oversight and clear accountability are essential for ensuring that strategic infrastructure projects progress efficiently. **LCCI recommends expanding the remit of the Industrial Strategy Council to include regular, evidence-based monitoring of infrastructure planning decisions.** This enhanced oversight would provide stakeholders with greater transparency and ensure that projects remain aligned with long-term national priorities.

For projects considered critical national priorities—such as major airport expansions and other key infrastructure initiatives—**we further recommend the introduction of a mechanism for parliamentary confirmation following the Secretary of State’s decision.** Drawing on best practices from Hybrid Bill processes, this confirmation process would reinforce legal certainty and reduce the risk of subsequent litigation, thereby safeguarding the timely delivery of critical projects while preserving democratic accountability.

Together, these measures would contribute to a more resilient planning framework by ensuring that strategic decisions are subject to rigorous oversight and remain immune to procedural delays.

6. Embedding Sustainability within Infrastructure Delivery

The environmental provisions in the Bill, notably the introduction of the Nature Restoration Levy (NRL), represent a positive step toward integrating sustainable development with infrastructure planning. **LCCI recommends that the implementation of the NRL be supported by additional measures to ensure its effectiveness without imposing undue burdens on developers.** Specifically, clear guidelines on thresholds and proportionality must be established, ensuring the levy is appropriately calibrated across different project scales. Furthermore, predictable timelines and robust oversight mechanisms should be put in place for fund allocation to manage collected resources transparently and efficiently. Finally, environmental objectives must be seamlessly integrated within the overall planning process so that sustainability measures reinforce, rather than delay, project delivery.

The Bill can catalyse private-sector investment in green infrastructure by aligning the Nature Restoration Levy and other environmental measures with clear delivery timetables. Predictable, proportionate sustainability requirements will encourage renewable energy projects, low-carbon transport upgrades, and biodiversity initiatives—positioning London and the UK at the forefront of the global green economy. This alignment between planning reform and environmental objectives will not only meet net-zero targets but also create a large number of skilled, green jobs and attract international “green” capital.

7. Conclusion

The Planning and Infrastructure Bill presents a vital opportunity to address persistent challenges in the UK’s infrastructure planning framework. While the proposed reforms lay a foundation by simplifying processes, clarifying legal and institutional frameworks, and integrating sustainability, there remains significant scope for further enhancements to achieve timely and robust outcomes. Constructive improvements—such as targeted procedural flexibilities, better alignment of interdependent approvals, and strengthened oversight measures—are essential to overcome lingering inefficiencies and uncertainties.

LCCI plays a crucial role in bridging the gap between government and business, serving as an indispensable platform for dialogue on streamlining decision-making. As a leading business-representative organisation, LCCI brings together diverse stakeholders from across London to offer practical, evidence-based recommendations. Our continued engagement is key to ensuring that government policies reflect businesses’ real-world challenges and opportunities. Promoting more effective engagement between policymakers and the business community can shape a planning system that reflects practical business needs, supports London’s role as an economic engine, and ultimately strengthens the UK’s long-term competitiveness and resilience.