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16<sup>th</sup> April 2025

To whom it may concern,

### **Planning and Infrastructure Bill: call for evidence**

With reference to your [call for evidence](#), dated 25<sup>th</sup> March, we make the following comments, in regard the Planning and Infrastructure Bill. These are made on behalf of the members of the [Thames Valley Chamber of Commerce](#) (TVCC) and with whom we have consulted to preparing this submission.

We trust our comments are received in good time for the first meeting of the Public Bill Committee which we understand will be held on Thursday 24<sup>th</sup> April 2025.

#### General Comments

TVCC supports the:

1. Current proposal to revise the **National Planning Statement** (NPS) every five years. To enable the mandate and ambitions of government to be achieved, we ask that:
  - a. Steps are taken to ensure that sufficient resources (financial/expertise) are made available to all relevant bodies to review and respond.
  - b. Due and equal consideration is taken of the business needs (in planning) and economic development drivers.
2. Proposals for increasing the **efficiency, effectiveness, and competence** of local planning authority (LPAs) committees. We ask that a [business-led solution](#) is adopted to:
  - a. Support LPAs to ensure they have the required/long-term resources to recruit and retain enough appropriately skilled local planning officers (across development control, policy, and strategic planning roles).
  - b. Ensure government resources sufficient, and flexible, training course places to produce a pipeline of professionals.
  - c. Meet the overall ambition to ensure decisions (at Ministerial level as well) are made quicker and timescales shortened. For example, the French government has a “Fast Track” way of getting new infrastructure delivered promptly (by paying 200% market value for land acquisition in Compulsory Purchase Order situations) rather than the UK approach of having lengthy and expensive Public Inquiries to make decisions and assess values etc.
3. Principle of **spatial planning** being undertaken, or co-ordinated, **at a strategic authority** (above present local authority) at, for example, a Thames Valley (Berkshire, Buckinghamshire, Oxfordshire, and Swindon) **level**. However, we invite government to consider:

- a. If Unitary Authorities are being considered with a population threshold of 500,000, why would strategic planning board be required to improve coordination across local planning areas? (see following comment in 3b).
  - b. By way of example, the Chamber have been advocating for the inclusion of Swindon to be included in any proposed Combined Strategic Authority for the Thames Valley. This would reflect, inter alia, the natural focus of the town looking towards the heart of the Thames Valley, the economic benefits; an economic functional geography that will deliver growth, most advantage to the town and greatly assist infrastructure planning and financial programming/funding streams.
  - c. Do we not consider this threshold to be of sufficient scale (to ensure new housing development are well distributed and align with local infrastructure plans for example) to streamline planning processes, speed up decision-making, and enable LPAs to manage planning fees and charges more effectively.
  - d. There is a potential danger of duplication and inefficiency here.
4. Proposals that overall, the Bill needs to set a **clear agenda for the preparation of strategic economic and spatial plans** by the newly created Combined Authorities. These plans need to be considered over a timescale (i.e. to 2060) that will provide a suitable period to facilitate planning and financial programming for the key infrastructure required to support economic and housing/community development. In so doing they will enable the relevant authorities to deliver locally prepared development plans (i.e. Local Plans and Neighbourhood Plans, etc) for local delivery of economic and housing development and related local infrastructure.
  5. Plans (see also DCO comments below) to **limit third party legal challenges** to major infrastructure developments of national importance.
  6. Opportunity, and need for improved engagement with our railways (akin to highways) to help deliver growth ambitions and making the most of Great British Railways (GBR) *coming down the tracks* (see points 12-13 below).
  7. View, that the Bill is the right vehicle for the government to **streamline the Development Consent Order (DCO) process**, including the process for approvals and judicial reviews. However, and as we outline below, we believe there is opportunity go further to reform the planning system.

#### Development Consent Order (DCO)

8. **Greater certainty around planning policy.** When considering, for example, major infrastructure projects and developments of critical national importance (including those driving our economic growth ambitions) we would like to see the planning system as an enabler to development and growth. There is evidently a need to consider planning applications fully, however, the planning system is often seen as a delaying factor, with legal challenges, including those to the NPS, and appeals being considered contributory factors. This can create uncertainty and actively hinders economic growth and investment in the UK economy.
9. **Standard Consenting Process:** We believe and encourage the Committee to consider:
  - a. Government should have the ability (on a case-by-case basis) to vary the standard consenting process to deliver, for example, major infrastructure and growth projects.
  - b. As it currently stands, consenting processes are too long, and statutory consultees are not given strict deadlines to respond. We think government should streamline consultation requirements, where appropriate, and ensure statutory consultees engage whilst also having the capacity and capability to do so in a reasonable timeframe. Put binding timetable in place to ensure speedy engagement by all parties.
  - c. Inviting stakeholders, including the Chamber of Commerce and business, be consulted on any proposed criteria, e.g., net level of support; nature of objections; national v local benefits and impact; urgency of delivery including alignment with other timetables, etc.

10. In regard our major airports, we support the comments made by Heathrow Airport (submitted 11<sup>th</sup>/04 and attached) in regard aligning **DCO and Airspace change processes**. To deliver ambitions for growth at the UK's only hub airport, and our regional airports, within the government timeframe, the UK airspace and infrastructure consenting processes need to be done together. In practical terms there may be a position where Heathrow has the permission to build a third runway but not the necessary airspace guarantees.
11. **One-Stop-Shop DCO.** For major schemes (e.g., Heathrow expansion, Western Rail Link to London Heathrow) and their promoters we understand there is a current requirement/need to obtain several authorisations (e.g., environmental, road, waste permits, construction consents, etc) as well as an overall DCO approval. We would invite the Committee should consider streamlining the authorisation process and provide the regulatory structure to enable the DCO approval to include/cover and therefore grant authorisations at the same time, albeit reflecting on the following considerations:
- a. The logical sequencing of the various consents required and whether this may require the DCO to start earlier and/or end later.
  - b. Will including everything delay the DCO, because more evidence and agency consultation will be required.
  - c. Will this result in removing power (and knowledge) from local and specialist bodies with deeper, better, understanding of the relevant issues and circumstances.

### Planning and Railways

We have some specific comments regarding the planning bill and railways. We invite the committee to consider:

12. **Treating railways like the Strategic Road Network.** We would argue that our railways are a lot like the strategic road network in that development can impact on a motorway in a cumulative way, and that a series of new housing developments can lead to junctions and sections of carriageway being over capacity. We see the same with train services, during peak periods they can be very crowded, and customers struggle to get on.
13. Whilst capacity impacts on our strategic road network is well understood, railways are, we understand, considered differently.
- a. For highways, there is a system of mitigation in place, where National Highways (NH) can make representation through, for example, Planning Inspectors Notices (PINs) at the Local Plan development stage. There is opportunity to demonstrate the cumulative impact of the new homes on the road network and ask for developer contributions as mitigation. This is supported by LPAs and the planning industry. The result is, often, additional road/junction improvements to add capacity on our major roads through new development. This whole process is enabled by licence granted by DfT to NH in 2015.
  - b. For our railways, they are seen differently (by LPAs, developers, etc). They understand that Local Plans, and subsequent planning applications, should encourage sustainable transport but only as far as to the front door of stations. Once the new people are at the door of the station, it is largely up to the railway to deal with extra journeys that the new homes have created.
  - c. We understand that until now, the railway industry response, to housing development driven cumulative impact, has been fragmented by separate responses by Train Operating Companies and Network Rail routes. The formation of GBR, however, brings forward the opportunity and the potential to champion this with one voice - much like NH does for the Strategic Road Network.

- d. Therefore, we would support the call from our regional train operating company, for the railways / GBR, to be granted the same licence that NH have. This will enable the railways to make similar representation at key stages of the Local Plan preparation and request contributions from new homes, for example, to mitigate the impact of cumulative development along a line of route and across local and strategic authority boundaries.

Yours sincerely,



**Paul Britton**  
**Chief Executive Officer**