UK BUILD REFORM

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A statutory framework for planning consent and infrastructure delivery.

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Households and workers pay for infrastructure delays through higher bills, lost investment and projects that never reach operation. We will give nationally important infrastructure one accountable route through designation, consent and delivery, so approved projects can retain their teams, finance and construction sequence.

Executive summary

Britain needs a dependable route from a national infrastructure decision to an operating asset. Planning reform should settle strategic questions once, define the remaining obligations, coordinate every permission needed to construct, and make public bodies accountable for the time and cost of their decisions.

The central problem is fragmented responsibility. A project can satisfy one authority and remain blocked by another; obtain planning consent and wait for a permit; or secure every permission and lose its workforce, contractor or financing during the delay. Planning and legal uncertainty magnify shortages of engineering capacity and capital. Reform must address those interactions.

We propose a statutory delivery framework for nationally important infrastructure. It retains six connected reforms:

- National corridors and zones that conclusively settle specified strategic questions, with a defined challenge window.
- Strategic environmental assessments that settle common evidence and allocate a measurable capacity for development.
- Environmental Delivery Plans with published tariffs, precise legal discharge and funded conservation obligations.
- Standard assessments and integrated permits, with automatic transfer of overdue decisions to a national decision-maker.
- An accelerated infrastructure court procedure with early challenges and remedies proportionate to the defect.
- Automatic host benefits backed by committed funding, alongside compensation for specific losses.

A Cabinet-level Secretary of State for Infrastructure and Delivery will own the framework, resolve strategic disputes and issue binding decisions under statutory powers. Approved standards will provide a defined compliance route: additional requirements must pass an enforceable necessity and proportionality test, with a binding technical appeal. A legislative schedule will specify duties retained, pooled, narrowed or repealed.

The October 2026 baseline already includes significant government reforms. This proposal builds on enacted measures and distinguishes them from announcements requiring further legislation. It supports a programme beginning on taking office. Inherited reforms should be used wherever they work, rather than restarted under new institutional names.

1 The causes of delay and high cost

Responsibility is fragmented

A national strategy does not necessarily provide the permissions, land rights, network investment or commercial commitments needed to execute it. Each body can protect its own statutory position while leaving the overall project undeliverable. No individual decision-maker then owns the combined delay.

This is an incentive problem inside government as well as outside it. A regulator bears reputational risk from an error but may bear little visible cost from delay. A department can announce a project before resolving its funding. A developer can retain a consented site without committing to build. Reform must attach responsibilities to each actor and expose the consequences of its choices.

Delay increases the cost of both capital and construction

Uncertain schedules increase the weighted average cost of capital (WACC), shorten the useful life of quotations and financing commitments, and discourage investment in specialist production. Contractors price standby and remobilisation risk into their bids. A project can become commercially unviable without ever receiving a definitive refusal.

The same uncertainty interrupts learning across successive projects. A factory, training programme or specialist construction team needs a credible pipeline of orders. Repeated pauses convert a potential fleet programme into a sequence of bespoke projects.

Some scrutiny prevents expensive mistakes

Environmental evidence, consultation and legal review can identify genuinely unsuitable sites, unlawful decisions and risks that a promoter has understated. Removing these functions indiscriminately would transfer risk to communities, investors and the state. Their value depends on scope, timing and the ability to reach a final decision.

The reform objective is to distinguish strategic choices, common technical questions and site-specific risks. A decision already settled on adequate evidence should carry legal weight downstream. A genuinely new material risk should still be examined, through a bounded procedure with an accountable decision-maker.

Permissions do not remove physical constraints

Coordinate permissions with equipment, engineering, finance and project management. Publish the physical and industrial constraints alongside the decision timetable.

Use the comparative infrastructure cost premium identified by Britain Remade and the Centre for British Progress to test the delivery system as a whole. Attribute realised savings to measured changes. [1]

2 The policy baseline in October 2026

The reform programme must start from the law and machinery inherited at implementation. Royal Assent, commencement, operational availability and proposed legislation are different states. The following distinctions govern this proposal.

Measures already enacted or implemented

The Planning and Infrastructure Act 2025 received Royal Assent in December 2025. Its provisions cover infrastructure planning, environmental delivery, land acquisition and other matters, with implementation proceeding through commencement and supporting measures. The Act provides the framework for the Nature Restoration Fund and Environmental Delivery Plans (EDPs). [2, 3]

Mandatory statutory pre-application consultation requirements for major infrastructure were removed from 24 July 2026. Developers still need adequate evidence and must satisfy the remaining application and examination requirements. Removing a prescribed procedure does not remove every reason for early engagement. [4]

England's August 2026 National Planning Policy Framework (NPPF) introduced clearer national decision policies and stronger development presumptions in selected locations. Its decision policies took immediate effect. National policy is an important baseline, but does not amount to the full corridor and integrated consent framework proposed here. [5]

Environmental delivery remains geographically specific

An EDP can discharge specified obligations for qualifying development within its scope. It does not remove all environmental duties. The draft Norfolk nutrient EDP is under consultation from 17 September to 27 October 2026; it should not be represented as an operational nationwide clearance system. Strategic plans require evidence, approved measures and delivery arrangements before projects can rely on them. [3, 6]

Further court and nuclear reforms are proposed

Government's May 2026 judicial-review proposals included parliamentary authorisation for selected critical energy projects and an early challenge window. September announcements expanded the intended parliamentary route to other nationally important infrastructure. These mechanisms require further legislation and detailed design. Existing reforms to infrastructure judicial review should be retained where effective. [7, 8]

The March Fingleton response envisaged nuclear legislation before the end of 2027 and a functioning Commission by summer 2028, subject to parliamentary timings. On 30 September, the Office for Nuclear Regulation (ONR) published a policy on Relevant Good Practice, reinforcing proportionate, outcome-

focused judgment. Guidance is progress; it does not establish this paper's statutory compliance protection or binding appeal. [9, 18]

Implementation should preserve useful work

Before introducing new legislation in the first session, publish a provision-by-provision audit of the inherited regime. Retain effective procedures, identify operational failures and amend gaps. Projects already progressing should be offered a controlled migration route that preserves completed examinations, environmental evidence and valid consents.

Reform 1 National designation and binding consent principles

Settle national need and location at the appropriate level

Legislation should enable ministers to designate National Infrastructure Corridors and Energy and Industry Zones, following a published assessment of national need, credible alternatives and cumulative effects. Designation should state the asset classes, capacity, geographical boundaries, strategic environmental conditions and enabling infrastructure covered. Designation and decision clocks should expressly cover substations, converter stations and 132 kV distribution reinforcement, not only transmission corridors and generating stations.

Priority designation should cover transmission, nuclear sites, reservoirs, transport links and infrastructure supporting major industrial and compute demand. Eligibility should be based on stated national criteria, including security, reliability, productivity and cost. Technology-specific restrictions must be addressed explicitly in the relevant legislation and policy statements.

Give designation legal effect downstream

Designation will conclusively settle the national need, selected corridor or zone, strategic alternatives and common environmental findings expressly listed in its binding decision schedule. A downstream body must accept those findings. It may reopen one only through a statutory variation based on material new evidence, fraud or a material departure from the approved assumptions; disagreement with the original balance is insufficient.

For a qualifying project, consent must be granted unless an enumerated refusal ground is established: incompatibility with the designation; failure to meet a retained safety or security duty under section 5; a material residual environmental impact that cannot meet the applicable requirements; or failure to secure an essential delivery condition. Refusal must identify the evidence, legal ground and why proportionate conditions cannot remedy the deficiency.

The schedule must identify residual questions, including site hazards, detailed engineering, land rights and retained operating licences. Designation cannot settle evidence it did not assess. The Bill must amend conflicting duties expressly; downstream authorities must not retain a second discretionary veto over a settled question.

Prevent designation itself becoming an indefinite process

The Secretary of State should decide designation within twelve months of publishing the proposed scope. Allow one published extension of up to three months for identified new material evidence. Strategic assessments must run concurrently. An overdue designation must trigger a statement to Parliament and an enforceable duty to decide, rather than an unbounded consultation restart.

Challenges to designation should use a defined filing window and accelerated court procedure. Subsequent challenges should not revive issues that could reasonably have been raised at that stage. Exceptions should address genuinely new material evidence, concealed information and rights that could not reasonably have been asserted earlier. Legislation must specify these boundaries.

Maintain discipline after designation

Approved corridors and zones should have published capacity limits and a delivery schedule. Designation must not confer an indefinite, transferable speculative asset. Where a promoter controls scarce capacity or public land, allocation should include development milestones and proportionate use-it-or-lose-it terms, with relief for demonstrable public-body delay.

A periodic review should update future capacity and strategic assumptions. It should not automatically reopen valid project consents or require compliant construction programmes to restart. Material changes should receive a targeted assessment of their actual effects.

Reform 2 Strategic environmental assessments and capacity

Assess shared effects once

For each designated corridor or zone, the state should commission a Strategic Environmental Assessment and, where required, a Habitats Regulations Assessment (HRA). These should examine credible alternatives, cumulative effects and the conservation measures needed for the proposed programme. Shared evidence should be available in a public register that individual projects can incorporate by reference.

A strategic assessment cannot lawfully or scientifically settle effects it has not examined. The framework must define the development assumptions and environmental features covered. Projects outside those assumptions require a targeted supplementary assessment; they should not trigger automatic repetition of the entire strategic exercise.

Define an environmental envelope

The approved plan should quantify the scale and type of development supported, the pressures allowed, the measures required and the margin for uncertainty. Allocate capacity transparently so that one project cannot consume the mitigation budget assumed by another. Record allocations and remaining capacity as projects enter, change or leave the programme.

Environmental obligations should have measurable outputs and dates. Where the evidence requires conservation measures before harm occurs, the programme must provide those measures in advance. Where phased delivery is scientifically justified and lawful, define the milestones and contingency

capacity. A payment alone does not create ecological capacity.

Use compensation where it is effective and legally available

The framework should allow strategic off-site measures where they deliver the required outcome more efficiently than repeated site-specific intervention. Some impacts are not substitutable: destruction of a particular irreplaceable feature cannot be assumed equivalent to expenditure somewhere else. Residual effects outside the envelope remain subject to a reasoned decision under the applicable law.

Introduce a proportionate procedure for negligible effects, with published scientific thresholds and cumulative-impact accounting. Small individual effects must not be exempted in a way that permits a large aggregate effect to escape assessment. Decisions should state the evidence and legal basis rather than rely on an undefined assertion of national importance.

Assign responsibility for delivery failure

The strategic delivery body should secure the necessary land, contracts and reserve measures before admitting development beyond available capacity. Independent monitoring should test outcomes, not just money spent. If measures fail, the body must implement its funded contingency plan and publish remedial action.

Compliant developers should receive a defined legal discharge for the covered impacts. Any reopening of that discharge must follow explicit statutory grounds and transition rules. Developers remain responsible for inaccurate declarations, departure from their approved scope and obligations the strategic plan did not cover.

Reform 3 Environmental Delivery Plans and published tariffs

Build on the existing statutory framework

Use EDPs and the Nature Restoration Fund where they can address shared pressures on protected sites and species. Extend their practical availability through a prioritised programme, beginning with constraints for which there is reliable evidence and deliverable conservation capacity. The programme should state which catchments and impacts will be covered, who will prepare each plan and when development can rely on it. [3]

Nutrient pressures, water-resource constraints and habitat disturbance involve different mechanisms. An ecological tariff cannot substitute for a physical water supply, wastewater treatment upgrade or abstraction permission. Utility investment plans and technical permits must be coordinated with the environmental plan.

Make compliance legally precise

Each plan should identify qualifying development, covered impacts, standard conditions, the charging schedule and the exact obligations discharged. A developer should be able to obtain a binding eligibility determination within the statutory timetable. Conditions should use published wording, with deviations permitted only for identified site-specific reasons.

Payment should discharge covered obligations only when the applicable statutory conditions are satisfied. The certificate should record the project, allocated capacity and outstanding duties. Authorities should not demand duplicate mitigation for the same covered effect, or represent an EDP certificate as clearance of every environmental requirement.

Set tariffs from delivery costs

Publish the tariff methodology and assumptions, including land, construction, maintenance, monitoring and contingency costs. Allow variation by genuine environmental pressure and delivery cost, rather than negotiation power. Tariffs should be independently audited and updated prospectively on a published schedule.

Reserve capacity must be funded. Where developers are admitted before all levy receipts arrive, provide an explicit financing arrangement for conservation measures. Public advances or guarantees must be costed and disclosed. Revenue from a growing number of applications is not an adequate substitute for committed delivery finance.

Allocate risk rather than leave it implicit

The delivery body should bear the risk of ordinary procurement and implementation failures within its agreed programme. Developers should bear the risk of their own non-compliance and project changes. Exceptional systemic failures require published intervention powers, compensation rules where appropriate and a funded remedy.

Keep accounts separately for each plan. Publish receipts, allocations, contracted measures, delivery progress and environmental results. Tender delivery competitively where suitable, with safeguards against conflicts of interest and concentration in a single provider. The purpose of pooling is dependable environmental delivery; it must not become an uncapped revenue stream for the administering institution.

Reform 4 Standard assessments and coordinated permissions

Standardise recurring questions

Develop modular Environmental Impact Assessment (EIA) requirements for repeatable assets. Each module should identify the evidence needed, the assessment method and the circumstances requiring site-specific additions. Accepted evidence should carry forward between equivalent projects and through later stages of the same project.

Procedural completeness and substantive adequacy are separate judgments. A checklist should determine whether an application contains the prescribed material. An accountable specialist must still decide whether that material supports consent. Requests for more evidence should identify the unresolved material question and why existing evidence cannot answer it.

Integrate the permissions needed to start work

Create an Integrated Infrastructure Consent covering scheduled planning, environmental, highways, drainage and construction permissions and relevant land powers. The Bill must remove the ability of a scheduled authority to veto incorporation of its consent, while preserving its technical input. The Centre for Policy Studies (CPS) identifies secondary consents as an important barrier. [10]

Each consent must state which permissions it grants, which statutory findings it binds and which specialist licences remain separate. Annex A sets the legislative choices. Retained operating licences and commercial network agreements must have concurrent decision dates. Standard conditions and a short variation procedure must prevent minor changes reopening settled questions.

Proposed statutory service standards

Apply the proposed service periods below through legislation, retaining shorter existing duties. Appendix E records their policy status; sector and judicial capacity must support implementation.

DECISION	PROPOSED PERIOD	CONSEQUENCE OF DELAY
Application validation	30 calendar days	One consolidated deficiency notice; national office resolves any overdue validation.
Ordinary consultee response	30 calendar days	Late advice waived; mandatory technical decisions transfer to the expert route.
Qualifying repeat project consent	6 months after validation	Decision function transfers automatically to the national decision-maker.
Other designated project consent	12 months after validation	Same automatic transfer; final national decision within 60 calendar days.
Routine condition discharge	30 calendar days	Automatic transfer; deemed discharge only for listed low-risk conditions.

After transfer, the 60-day final decision rule applies to both consent classes. Compulsory technical work and seasonal surveys must enter the initial schedule. Only the independent appeal panel may authorise a limited clock pause for essential missing evidence; repeated information requests cannot restart the period.

Reform 5 Early legal challenges and proportionate remedies

Use a dedicated infrastructure procedure

Establish an infrastructure list within the existing court system, with specialist judges and funded administrative capacity. Bring related challenges together where lawful. Publish service standards for permission, substantive hearings and appeals, developed with the judiciary. Delay targets must not be enforced by automatically extinguishing a meritorious claim because the court has insufficient resources.

A six-week filing window should apply to designated final decisions, unless a shorter applicable period is justified through legislation. An early challenge window should allow legal issues to be identified and addressed before final consent. A later claim should normally be restricted to unresolved issues raised in time and genuinely new matters that could not reasonably have been raised earlier. The notice and disclosure requirements must make that opportunity meaningful.

Specify the additional remedy rule

The Judicial Review and Courts Act 2022 already gives courts powers to suspend quashing orders and limit their retrospective effects. This proposal should strengthen their application to designated infrastructure rather than present them as a new invention. [11]

For a curable defect, the statutory starting point should be a time-limited correction, with the scope of permitted activity defined by the court. Quashing or an injunction remains available where necessary to address material illegality, serious procedural unfairness, fundamental rights or a risk of irreversible harm. Whether a defect changes the final outcome is relevant, but cannot be the sole test: an unlawfully excluded participant may be unable to prove the counterfactual.

Commit to a parliamentary route for critical projects

The Bill will establish a parliamentary authorisation route for a published Critical Infrastructure Schedule: the initial nuclear fleet, indispensable transmission links and nationally critical water projects meeting stated scarcity and security tests. Government must table each eligible project's final package within thirty sitting days of completed examination, or give Parliament a reasoned refusal. This develops the government's proposed route. [7, 8]

Project-specific legislation will approve the whole scheduled consent package and state exactly which domestic challenge grounds are closed and which remedies remain. Publish costs, technical findings, alternatives and residual risks before the vote. Retained safety licences remain necessary. Disclose international obligations and compensation exposure; no promoter self-certification or general retrospective reversal of court judgments.

Manage construction during a challenge

Permitted enabling works should be defined in advance by reversibility and risk. A limited state indemnity may be considered for specified abortive costs of approved works while a challenge is pending. Any scheme needs a cash cap, exclusions, priced risk and fiscal disclosure. It must not become a general guarantee of construction overruns or undermine the intended statistical classification of a mutual vehicle.

Reform 6 Automatic host benefits and local compensation

Make the local entitlement clear before consent

Designated infrastructure creates national benefits and concentrated local disruption. Publish a Host Benefit Tariff before applications are decided. It should define eligible households, community funds, payment dates and the treatment of construction and operational effects. Entitlements should follow

measurable exposure, not the ability to negotiate or threaten delay.

The tariff should recognise differences between a transmission corridor, a reservoir, a power station and major transport works. Publish national principles with asset-specific schedules and limited cost-based local adjustments. Independent administration and a short eligibility appeal should prevent both promoter discretion and local political favouritism.

Guarantee a minimum payment from identified funding

Include host benefits in project appraisal and the financing plan. Secure the minimum entitlement through escrow, a funded payment schedule or an enforceable obligation with adequate security. For privately financed regulated assets, determine transparently how these costs enter the regulated revenue allowance. For public projects, include the commitment in the authorised budget.

Keep different obligations distinct

Host benefits should supplement compensation for land acquisition, easements and specific losses. They should not substitute for environmental mitigation, necessary public services or lawful compensation. A formulaic community payment cannot justify an otherwise unacceptable safety risk.

Coordinate host benefits with applicable Section 106 obligations and the Community Infrastructure Levy (CIL), avoiding double charging for the same purpose. Identify the funding and delivery responsibilities for necessary local services and affordable housing under the applicable framework before project commitments are made.

Test the incentive effect rather than assume acceptance

Automatic benefits reduce uncertainty and the financial incentive for repeated bargaining. They will not eliminate principled opposition, disagreement over location or distrust of delivery promises. Publish payment performance and assess local acceptance alongside the actual scale of disruption.

Payments should not depend on support for the scheme or withdrawal of a lawful objection. Any clawback should follow published eligibility rules. Benefits should remain visible through construction, when disruption is greatest, rather than be postponed until the asset begins earning revenue.

3 A Cabinet minister with statutory decision powers

Create a Secretary of State for Infrastructure and Delivery

Establish a dedicated Cabinet role accountable for nationally designated infrastructure across energy, water, transport and industrial development. The Prime Minister should give the minister a standing mandate to resolve departmental conflicts and chair a Cabinet delivery committee. Cabinet status supplies political authority; the Bill must supply the legal powers.

The Secretary of State will own designation, binding consent principles, the integrated consent regime and the final strategic decision on transferred cases. Powers must include directing decision timetables, obtaining records, transferring scheduled functions and settling conflicts within the legislative hierarchy. A duty merely to coordinate other departments would reproduce the present weakness.

Keep programme ownership clear

Sector Secretaries of State retain energy, transport, water and housing programmes and their budgets. Each programme has a named senior responsible owner and a published agreement covering land, finance, equipment, consent and commissioning. The infrastructure minister intervenes at cross-government disputes and statutory decision points; routine approvals are delegated under published rules.

ACTOR	REQUIRED RESPONSIBILITY
Infrastructure Secretary	Own the framework; decide designation, strategic disputes and exceptional transferred consents.
Sector minister and programme owner	Own delivery, procurement, budget and the integrated schedule; disclose failures and recovery plans.
National delivery office	Administer integrated cases and transfers; obtain timely decisions and publish the decision register.
Technical regulators and appeal panel	Determine technical compliance and extra requirements under binding statutory tests.
Treasury and Parliament	Authorise public expenditure and scrutinise fiscal exposure and exceptional project legislation.

Provide executive capacity and an accountable boundary

Build the executive office from the National Infrastructure and Service Transformation Authority (NISTA) and existing planning delivery capacity. Give it the case teams, engineering expertise and statutory remit needed for the role. Keep independent assurance and appeals organisationally separate from the team promoting delivery; publish conflicts of interest and decision reasons.

A Treasury funding dispute should receive a joint submission to the Prime Minister and a Cabinet decision within twenty working days. Public spending still requires lawful budget authority. UK ministerial powers operate within the territorial settlement described in section 8. The infrastructure minister cannot override an intolerable technical risk or confer an operating licence by political instruction.

4 Overdue decisions and binding national resolution

Transfer the decision function automatically

On expiry of a statutory consent deadline, the relevant decision function and complete case record will transfer by operation of law to the national delivery office acting under the Secretary of State’s authority. Administrative referral must occur within five working days, but failure to refer cannot delay the transfer. The original authority becomes a source of evidence and expertise, with no continuing veto over that decision.

The replacement must grant consent, impose lawful conditions or refuse on an enumerated ground within sixty calendar days of transfer. The consent tests in Reform 1 apply. A decision already assigned to the infrastructure minister remains subject to its deadline and enforcement; it cannot acquire a fresh

period by transferring between teams.

Limit extensions and make failure enforceable

Allow one extension of up to thirty calendar days only where the independent technical appeal panel certifies that specific new material evidence is essential to a lawful decision. Publish the evidence gap, work required, responsible actor and fixed end date. Ordinary staff shortages, institutional disagreement and repeat requests for existing information are not grounds.

The promoter and affected parties must have access to an expedited application for a mandatory court order requiring the overdue decision. A missed final date also requires the Secretary of State to explain the failure and recovery action to Parliament within ten sitting days. Courts should enforce the duty to decide; they should not be required to invent a technical consent from silence.

Separate advice from indispensable technical approval

A late advisory consultation response is waived for that stage. An overdue retained safety or operating decision transfers to an accredited, independent technical decision-maker under the same substantive law, appointed through the appeal system. The infrastructure minister controls the process and resolves strategic trade-offs but cannot substitute political judgment for the technical finding.

Where further essential technical work prevents approval, the replacement must issue a reasoned refusal identifying the unmet requirement and route to compliance. Refusal is appealable and cannot be used simply to disguise administrative delay. Deemed discharge is confined to an explicit statutory list of low-risk administrative conditions; high-consequence permissions always require an affirmative decision.

Expose the cost of the decision

Publish the cost and time imposed by conditions, extensions and refusals, with the benefits or risks they address. Report refusal dates relative to statutory deadlines, stated grounds, appeal outcomes and reversals, and repeated information requests. Independent assurance should examine patterns of unsupported refusals immediately before deadlines, unnecessary demands and promoter omissions. Performance measures must distinguish timely, defensible refusals from unresolved cases; rewarding approval rates alone would distort decisions.

5 An enforceable proportionality rule

Make approved standards a protected compliance route

Amend the mandates of covered authorities to require timely, necessary and proportionate decisions, counting the cost of delay and lost infrastructure output. Nationally approved reference designs, assessment methods and standard conditions will establish compliance for the questions and operating assumptions they expressly cover. The promoter must demonstrate conformity and disclose relevant site conditions; approval of a design does not settle an unassessed site hazard.

Once conformity is established, the authority bears the burden of justifying any additional requirement. It must show a material risk or unmet outcome outside the approved scope, material new evidence undermining approval, or a demonstrable deficiency in application. A preference for another design, an

idealised zero-risk benchmark or a different official's interpretation is insufficient.

Require a decision record that can be tested

- Identify the specific risk or legal outcome, baseline exposure, affected people or environment, and the quality and limits of the evidence.
- State the incremental improvement expected from the proposed measure, using ranges and sensitivity tests where quantification is feasible.
- Price the full incremental burden: construction, redesign, fleet disruption, finance, delay and foregone capacity; identify who bears each cost.
- Compare feasible alternatives, including the approved baseline, and explain why a less burdensome measure cannot achieve the required outcome.
- Show that the measure passes the applicable statutory risk and proportionality test; identify the official responsible and the decision date.

Non-monetisable harms and material uncertainty must be explained and tested. They cannot be assigned zero value, but neither can an unspecified possibility justify unlimited expenditure. Environmental and safety decisions need sector-specific methods; a single monetary threshold would give false precision.

Attach a legal consequence

A requirement that fails this test cannot lawfully be imposed or maintained. The independent appeal panel can remove, vary or substitute it and bind the authority. A bare assertion that extra protection is desirable does not discharge the burden. Informal demands that would obstruct consent must be recorded as appealable decisions within five working days of request.

Promoters remain responsible for complete evidence, truthful disclosure and safe operation. The burden shift concerns additional demands beyond an established compliance route. It does not require an authority to prove a project dangerous before asking for the prescribed safety case, or excuse a project that cannot demonstrate conformity.

Technical risk thresholds and independent appeals

Set society's risk policy nationally

Parliament should establish a framework for sector-specific tolerability thresholds, approved through affirmative regulations following expert advice and public scrutiny. Above an intolerable threshold, a project must change or be refused. Below a broadly acceptable threshold, further risk reduction should be presumed unnecessary unless the authority demonstrates compelling material reasons. In the intermediate region, the applicable statutory test governs further measures.

Current health-and-safety law uses the principle of reducing risks as low as reasonably practicable (ALARP), with a gross-disproportion test that favours risk reduction. It is not ordinary cost-benefit balancing. Our protected compliance route and revised treatment of broadly acceptable risk must be

enacted consistently with that law, including explicit amendments where necessary. Guidance alone cannot reverse the legal burden. [17]

For the intermediate region, define the gross-disproportion test and publish sector methods, treatment of uncertainty and escalation thresholds. Do not require every conceivable improvement at any cost. Establish approved-standard protection for covered risks, while preserving targeted reassessment for compelling new evidence. The 2026 nuclear reform programme provides a starting point; its risk definitions and implementation must be audited before further amendment. [9]

Create a binding merits appeal for technical disputes

Establish an independent Infrastructure Technical Appeals Panel with accredited sector specialists, protected appointments and strict conflict-of-interest rules. A promoter or directly affected party can challenge an extra requirement, a refusal or a departure from a binding finding. The panel must determine the evidence and statutory test afresh; it is not confined to checking whether the authority wrote an explanation. For a challenged refusal, test whether the stated ground is supported by evidence, whether requested missing information is genuinely necessary, and whether proportionate conditions could remedy the deficiency. An unsupported refusal must receive the same scrutiny as unjustified delay and cannot be used to evade the statutory timetable.

File within twenty calendar days of the recorded decision. The panel should decide interim scope within ten days and the appeal within forty-five days, allowing one fifteen-day extension for specified essential evidence. It may strike out repetitive challenges, compel disclosure, substitute conditions and issue binding technical findings or the scheduled technical permission. Publish precedents and permit legal challenges through the accelerated court route.

Keep work moving within the approved scope

An appeal does not automatically stop the whole project. The panel must identify whether the disputed work creates a credible risk of irreversible harm and impose a targeted pause where needed; undisputed compliant work may continue. Genuine urgent hazards justify immediate protective action, followed by prompt review. Repeated temporary notices cannot become an indefinite substitute for a decision.

The Secretary of State makes the final strategic and integrated-consent decision within the law and the panel’s binding technical findings. Ministers cannot waive an intolerable safety risk. Changing the national risk framework requires the prescribed parliamentary process, rather than a private concession for an individual project.

6 Procurement construction and financing

Convert a pipeline into committed orders

A map of future projects is insufficient to support investment in factories and skills. Publish a sequenced programme with commercial commitment points. Standard contracts, credible funding and repeated specifications should allow suppliers to invest against orders rather than political aspirations. Procurement should preserve competition while giving successful suppliers enough continuity to recover investment and improve productivity.

Use reference designs and standard construction methods where justified. A technical change should state the problem it resolves, the quantified risk reduction where possible, its cost and the effect on the fleet. Unpriced preferences from multiple authorities should not accumulate into an uncontrolled redesign.

Apply a fleet approach to nuclear

Once a reactor design has been approved, subsequent units should use that approval for unchanged elements. Assess site-specific hazards, cooling, security, emergency arrangements and material new evidence separately. A generic approval does not remove site licensing or justify ignoring a risk that was not covered.

Place early manufacturing orders only against a credible consent and financing programme, with disclosed cancellation exposure. Align factory capacity, specialist trades, construction logistics and network reinforcement. Commissioning should be planned alongside construction. A shorter planning period cannot eliminate physical build time or first-of-a-kind engineering risk.

The Fingleton programme provides a basis for reducing duplication and clarifying regulatory leadership. The delivery agreement should identify which measures are operational, which require legislation and which dependencies remain unresolved. Policy Exchange’s 2026 work emphasises the need to align governance with skills, supply chains, finance and grid planning. [9, 12]

Connect the whole energy programme

The National Energy System Operator (NESO) plan proposed in the wider energy reforms should identify when generation and demand require transmission capacity. Network providers should have enforceable investment milestones and an agreed mechanism to recover efficient anticipatory expenditure. Generation consent without a dependable connection date does not create usable capacity.

Coal, gas, nuclear, storage and demand-side assets should be assessed by their system contribution under the replacement energy objectives. The programme repeals the Climate Change Act, amends the Energy Act 2013 emissions performance standard and changes connected planning and operating rules. Replace UK ETS with the carbon tax and close UK CBAM under Appendix C’s timetable, from the start of year two, preserving earlier liabilities. Integrated consent must identify applicable duties rather than presume that repeal makes every plant lawful. The shared legislative schedule provides the boundary. [20–23]

Preserve financing credibility and fiscal honesty

For nuclear, government would absorb the early demonstration risk under the separate financing proposal. Later assets could move into an independent, British-controlled, asset-locked mutual once their construction and revenue risks are financeable. International debt finance is compatible with that control model.

Planning coordination and clear revenue arrangements support financeability, but do not establish off-balance-sheet treatment. Seek early classification advice from the Office for National Statistics (ONS) and engage the Prudential Regulation Authority (PRA) on insurer eligibility under the matching adjustment. Assess the actual financing terms and disclose public guarantees, host commitments and environmental backstops.

7 Sequencing and measurable performance

Preparation before taking office

Before implementation, audit inherited reforms, prepare the express repeal and replacement schedules and identify priority sites and corridors. Map the carbon tax transition, ETS closure and final settlement, surviving assessment duties and devolved law. Gather strategic evidence and recruit technical capacity. Promoters should prepare realistic construction programmes and identify long-lead commitments requiring early decisions.

The Infrastructure Delivery Bill and first commencement

Introduce the Infrastructure Delivery Bill in the first session (Programme Annex Appendix F) to enact binding designation, integrated consent, transfer and proportionality powers, with the selective legislative amendments in Annex A. Appoint the Cabinet delivery minister on entry and prepare the executive office. Establish the independent appeal panel and fund the infrastructure court list before the dependent commencement. Publish programme agreements and assessment modules. Prepare designation and strategic assessment concurrently; exercise new powers after their commencement and readiness tests, and secure host entitlements before entry.

Apply transitional rules to existing applications. Reuse valid evidence and permissions, with a defined comparison of the obligations under each route. Promoters should not be allowed to switch repeatedly between regimes to avoid an unfavourable decision.

First two years after statutory commencement

Approve the first strategic environmental plans where the evidence and funded measures are ready. Secure land rights and enabling infrastructure. Use early repeat projects to test validation, secondary consent coordination and condition discharge. Commit manufacturing and training expenditure at explicit commercial milestones.

Scaling depends on demonstrated administrative and technical capacity. Admission to an environmental plan should reflect its actual capacity. Projects with unresolved material risks should receive a decision and a defined remedy, rather than disappear into an unreported queue.

Later delivery through year five and beyond

Expand the programme using evidence from delivery. Track assets commissioned, construction productivity and total cost alongside consent speed. A programme for the first five years should identify what can realistically reach operation in that period, what can begin construction and what requires a longer horizon. Consent targets must not be represented as nuclear completion guarantees.

Report outcomes that expose failure

- Elapsed time from first formal engagement to a usable construction permission, showing median and 90th percentile by asset type.
- Time lost to public-body decisions, sponsor changes, legal proceedings, finance and supply constraints, with extensions recorded.

- Capacity commissioned and connected, infrastructure completed, and cost per comparable unit with transparent scope adjustments.
- Environmental outcomes, contingency measures used, host payments delivered and safety performance.
- Forecast accuracy, contractor continuity, repeat-unit productivity and quantified contingent public liabilities.

A falling judicial-review success rate is not an independent policy goal. The relevant tests are whether decisions are lawful, legitimate errors are corrected promptly and avoidable delay falls. Publish an annual independent assessment and amend failing procedures without routinely reopening valid consents.

8 Territorial scope and integration with other reforms

Use a UK strategy with jurisdiction specific implementation

Planning, environmental regulation and compulsory purchase operate through different regimes across the UK. The proposal needs separate legislative schedules for England, Wales, Scotland and Northern Ireland, identifying reserved matters, devolved responsibilities and cross-border dependencies. Existing national infrastructure powers do not erase those distinctions.

Wylfa requires an explicit map of the permissions, regulators and decision-makers involved. Transmission links and other cross-border corridors need coordinated timetables and an agreed escalation protocol. UK funding or strategic designation should not be presented as a substitute for powers that must be exercised under the relevant jurisdiction's law.

Keep ownership and development permission separate

The framework should apply to qualifying infrastructure whether the promoter is public, mutual or private. Strategic control arrangements belong in the wider energy legislation and corporate instruments. A transmission golden share is intended to protect specified sovereign interests; it does not itself confer planning or land powers.

Apply UK Energy Reform Programme Annex Appendix A's ownership perimeter. Delivery eligibility follows national need and readiness; ownership supplies no consent.

Coordinate infrastructure and local services

For housing-enabling infrastructure, coordinate reservoirs, wastewater treatment, power connections and transport with planned development. Identify the required local services, funding sources, responsible bodies and delivery dates in project appraisal. Secure committed funding and enforceable delivery arrangements before relying on those works.

Test the package against representative projects

Before legislation, work through a repeat small modular reactor (SMR) at Wylfa, a transmission corridor, a reservoir and a major wastewater upgrade. For each, identify every consent, land right, legal challenge route, expenditure commitment and commissioning dependency. Publish the proposed decision

timetable and which actor can lawfully resolve each blockage.

These worked applications should expose gaps in the framework before capital commits. They should distinguish time that rules can remove from engineering, evidence collection and physical construction that must still occur. Schedule claims should identify their assumptions and confidence range.

Annex A Legislative choices for the new framework

The Infrastructure Delivery Bill must include a schedule of express amendments, rather than a general duty to cooperate. The choices below are policy commitments for designated projects; legal drafting must map every affected provision, its territorial extent and commencement against the regime inherited on taking office. No existing duty is presumed untouchable merely because it is already statutory.

TREATMENT	DUTY OR PROCEDURE	REQUIRED CHANGE
Retain	Technical safety, security and operating duties	Keep affirmative licensing, genuine intolerable-risk limits, enforcement and truthful disclosure. Reform standards, proportionality and appeals as specified in section 5.
Pool	Strategic environmental and cumulative assessments	Make approved common findings binding; use funded strategic measures and Environmental Delivery Plans for precisely covered impacts.
Narrow	Project-level environmental assessment	Confine repeat assessment to residual site effects, departures and material new evidence; remove demands to revisit settled strategic alternatives.
Narrow	Habitats and species procedures	Permit earlier mitigation, shared evidence and scientifically defined negligible-effect rules with cumulative accounting. Require targeted assessment outside the approved envelope.
Repeal and replace	Duplicate mitigation and unscheduled additional conditions	Disapply repeat duties for impacts legally discharged by the strategic scheme; replace open-ended extra demands with the binding necessity test and appeal.

Make environmental trade-offs a legislated choice

For designated infrastructure, replace section 156(1) of the Levelling-up and Regeneration Act 2023's historic no-reduction test with a Parliament-approved outcomes framework and expressly authorised departures. This is a substantive policy change, not merely a new label for the same constraint. Retain informed public engagement and identify the international obligations that continue to constrain the new framework. [19]

The national designation must disclose the specific environmental cost, alternatives and compensating measures before a trade-off is authorised. Any permission to depart from an absolute domestic restriction must be written into legislation with bounded criteria; a minister's general preference for faster delivery cannot supply it. Non-substitutable harm and obligations that remain absolute must be listed explicitly.

The objective is to repeal redundant process and permit specified national trade-offs openly. Abolishing Natural England or the Environment Agency without changing their duties would leave the legal obstacle in place and could destroy assessment capacity during transition.

Legislative hierarchy and the integrated consent package

TREATMENT	DUTY OR PROCEDURE	REQUIRED CHANGE
Replace	Secondary-consent incorporation barriers	Amend the Planning Act 2008 and connected consent regimes so listed permits enter the integrated order without a separate authority's discretionary veto.
Transfer	Overdue public decision functions	Provide automatic vesting, compulsory record transfer, substitute decision powers and enforcement. List the technical functions reserved to accredited independent specialists.
Bind	Downstream planning and regulator findings	Make designation and technical appeal findings binding within their express scope. Amend conflicting decision duties rather than rely on policy weight.
Narrow	Open-ended information requests and guidance	Require one consolidated notice, defined evidence gaps and controlled additions. Guidance cannot create a new legal obligation without the statutory test.
Pool	Project biodiversity and mitigation charges	Replace overlapping charges for the same covered effect with one funded obligation. Retain liability for additional impacts, false declarations and departure from scope.
Replace	Critical-project final authorisation	Provide a committed parliamentary route covering the scheduled consent package, with project-specific legal effect and expressly retained remedies.
Retain and adapt	Land rights, compensation and host benefits	Integrate necessary acquisition powers while retaining compensation and procedural rights; make host benefits a separate funded entitlement.

State the order of authority

Within the new regime, the Act and project-specific parliamentary authorisation govern; nationally approved risk and outcome rules follow; designation binds the questions it settles; the integrated order determines scheduled permissions; residual specialist licences address only retained matters. A final clause must resolve conflicts between these instruments expressly. International duties and the territorial settlement require separate provision.

Preserve investment continuity

Commence prospectively with one controlled migration option; preserve permissions and completed evidence. Preserve accrued payments and enforceable rights. New contracts distinguish breach, defined public termination and expressly allocated policy risks from general taxation and regulation retained by investors. Targeted measures must not evade committed revenues. Publish compensation exposure; no blanket indemnity follows and planning legislation cannot cancel energy support. Use UK Energy Reform Programme Annex Appendix E for consolidated costing.

Energy repeal and the infrastructure hierarchy

Make the energy amendments express

Apply UK Energy Reform Programme Annex Appendix C's repeal and replacement framework to designated energy infrastructure. Authorities must identify the retained outcome and apply the enforceable proportionality test.

The energy amendments in UK Energy Reform Programme Annex Appendix C must align with integrated consent so the approved operating envelope is lawful. Map every remaining licence and permission in the project schedule.

The consent schedule must also amend the 2025 decarbonisation-readiness provisions in the 2016 environmental permitting regulations and map their territorial equivalents. Replace mandatory future conversion proof with justified, priced options while retaining operating safeguards. Coordinate changes to Electricity Capacity Regulations 2014 and Capacity Market Rules with the generation purchasing route. Permission to construct cannot substitute for permission to operate or eligibility for the revenue assumed in financing. [N1–N2]

Retain necessary evidence and territorial clarity

Retain climate-risk assessment and adaptation reporting under replacement duties, including water availability, flooding, cooling and physical infrastructure resilience. Preserve environmental impact assessment and consistent disclosure of material downstream effects. The Finch judgment concerns assessment legislation; repeal alone does not remove it. National designation may settle the strategic decision within its scope, while residual project effects receive the targeted examination specified here. [20, 24]

List international obligations and separate devolved duties, with explicit changes where needed. Map each jurisdiction; designation cannot replace a missing power. Add the onshore licensing, Petroleum Act sections 4A and 4B, connected Infrastructure Act safeguards and section 49 amendments identified in the fracking essay alongside the separate offshore mandate. Preserve valid permissions, evidence and accrued rights through one controlled migration route. [O1–O2]

Coordinate carbon and contract transition

Apply UK Energy Reform Programme Annex Appendix C’s carbon and contract transition. Consent appraisal uses applicable costs; infrastructure powers do not cancel energy contracts.

Procurement support and project commitment checks

Consent does not authorise an unlawful award

The legislative schedule must map the Procurement Act 2023, Subsidy Control Act 2022, distinct territorial procurement rules and applicable international obligations alongside consent law. For each relevant fleet order, service contract, research award, guarantee or asset transfer, identify contracting status, commercial or subsidy treatment, award route, funding, required referral, modification rules and challenge timetable. Use existing lawful routes or specify targeted amendments before commitment. Neither national designation nor a ministerial direction creates an implicit exemption. UK Electricity Market Reform owns the detailed transaction schedule. [F5-F6]

Keep contract classification separate from the business model

Retail service concessions must be classified by actual remuneration, exploitation rights and real operating risk; a service-contract route may be appropriate. Wholesale-risk separation remains the policy irrespective of procurement terminology. Infrastructure permissions cannot settle supply licensing, market settlement or the legal award category. [F7]

Release ready projects against their relevant obligations

Apply the project and tranche release test in UK Energy Reform Programme Annex Appendix E.

Use one host benefit schedule for each activity

The fracking host-benefit schedule implements the common tariff for shale activity. It is not an additional charge for the same exposure. Define equivalent-payment credits and the treatment of shared sites before consent. Direct compensation for attributable damage remains separate; neither a community payment nor a credited tariff buys immunity from operating obligations.

Additional energy interfaces and retained functions

Coordinate fiscal commencement

The levy abolition and transition schedule in UK Energy Reform Programme Annex Appendix C applies.

Treasury and HM Revenue and Customs own levy and agreement closure. The infrastructure minister has no independent power to cancel tax liabilities or support contracts. Publish the commencement and transition schedule alongside the energy legislation, with the fiscal exposure in UK Energy Reform Programme Annex Appendix E.

Include the nuclear waste route

Generation Expansion and Mutual Finance sets the national waste-capacity, transport, interim-storage and disposal interface. Designate qualifying waste infrastructure where justified and integrate scheduled consents. Preserve retained technical approvals and essential geological investigations. The consent-based disposal siting policy remains unless expressly changed; reactor designation cannot silently settle a separate disposal site or host commitment. Historical clean-up and operator-funded liabilities remain legally and financially attributable.

Keep the programme boundary visible

The retained heating, transport and gas-infrastructure boundary in UK Energy Reform Programme Annex Appendix C applies.

Other Energy Sources and Storage uses the same compliance route and decision clocks for qualifying projects. Ownership alone neither confers consent nor extends the mutual perimeter. NESO retains technical and operational service responsibilities; the central purchaser contracts only expressly assigned services without duplicate procurement.

What this paper does not claim

Faster decisions do not remove necessary engineering, evidence or technical permissions. The proposed statutory framework must be enacted and implemented in each relevant jurisdiction.

Annex B Sources

Policy status is stated as at 11 October 2026. Sources distinguish current measures, implementation plans, consultation proposals and party commitments. Numbered references identify the factual baseline; the operational rules and service standards in the main paper are our policy proposals.

[1] Britain Remade and Centre for British Progress. Building More for Less. 18 June 2026.

https://www.britainremade.co.uk/moreforless

[2] UK Government. Landmark Planning and Infrastructure Bill becomes law. 18 December 2025.

https://www.gov.uk/government/news/landmark-planning-and-infrastructure-bill-becomes-law

[3] Defra and Ministry of Housing Communities and Local Government. Implementing the Nature Restoration Fund. 18 December 2025.

https://www.gov.uk/government/publications/nature-restoration-fund-implementation-plan/implementing-the-nature-restoration-fund

[4] UK Government. Fastest infrastructure building in a generation as planning rules overhauled. July 2026.

https://www.gov.uk/government/news/fastest-infrastructure-building-in-a-generation-as-planning-rules-overhauled

[5] Ministry of Housing Communities and Local Government. Creating a clear rules based planning system. 17 August 2026.

https://www.gov.uk/government/publications/creating-a-clear-rules-based-planning-system/creating-a-clear-rules-based-planning-system

[6] Defra and Natural England. Draft Norfolk Environmental Delivery Plan consultation. 17 September to 27 October 2026.

https://consultations.defra.gov.uk/consultation-on-a-new-environmental-delivery-plan

[7] UK Government. Getting Britain Building Reforming judicial review for infrastructure. 20 May 2026.

https://www.gov.uk/government/publications/getting-britain-building-reforming-judicial-review-for-infrastructure/getting-britain-building-reforming-judicial-review-for-infrastructure

[8] HM Treasury. Chancellor takes axe to delays holding back growth. 7 September 2026.

https://www.gov.uk/government/news/chancellor-takes-axe-to-delays-holding-back-growth

[9] Department for Energy Security and Net Zero. Building our nuclear nation Government response to the Nuclear Regulatory Review 2025. 13 March 2026.

https://www.gov.uk/government/publications/building-our-nuclear-nation-government-response-to-the-nuclear-regulatory-review-2025/building-our-nuclear-nation-government-response-to-the-nuclear-regulatory-review-2025-accessible-webpage

[10] Centre for Policy Studies. Lowering Infrastructure Costs. 2026.

https://cps.org.uk/wp-content/uploads/2026/09/CPS_LOWERING_INFRASTRUCTURE_COSTS.pdf

[11] UK Parliament. Judicial Review and Courts Act 2022 Explanatory notes on quashing orders. 2022.

https://www.legislation.gov.uk/ukpga/2022/35/notes/division/6/index.htm

[12] Policy Exchange. Realising the Fingleton Review and The Nuclear State. 2 and 22 April 2026.

https://policyexchange.org.uk/publication/realising-the-fingleton-review/

Companion paper: The Nuclear State

https://policyexchange.org.uk/publication/the-nuclear-state/

Background policy references

[13] Conservative Party. Policies Announced at CPC26. October 2026.

https://www.conservatives.com/news/policies-announced-at-cpc26

[14] Reform UK. Planning Teal Paper. September 2026 consultation.

https://www.reformparty.uk/policies/planning-teal-paper/download

[15] Restore Britain. Energy Security Outlook. May 2026.

https://www.restorebritain.org.uk/energy_policy_paper

[16] Social Democratic Party. Energy Abundance. 2025.

https://www.sdp.org.uk/energy_abundance

Technical and legislative sources

[17] Health and Safety Executive. Reducing risks protecting people Appendix 3 on reasonable practicability. 2001 framework accessed 11 October 2026.

https://assets.publishing.service.gov.uk/media/6634988fcf3b5081b14f30cd/IQ8.10.J_Document_9_Health_and_Safety_Executive__Reducing_risks__protecting_people__HSE_s_decision-making_process__2001.pdf

[18] Office for Nuclear Regulation. New policy on Relevant Good Practice. 30 September 2026.

https://www.onr.org.uk/news/all-news/2026/09/onr-unveils-new-policy-on-relevant-good-practice-to-support-more-enabling-and-proportionate-regulation

[19] UK Parliament. Levelling-up and Regeneration Act 2023 Part 6. Current legislation accessed 11 October 2026.

https://www.legislation.gov.uk/ukpga/2023/55/part/6/data.html

Legislative sources

[20] UK Parliament. Climate Change Act 2008. Targets, budgets, committee, trading-scheme powers and adaptation provisions.

https://www.legislation.gov.uk/ukpga/2008/27/contents

[21] UK Parliament. Energy Act 2013. Decarbonisation, electricity market reform, emissions performance standard and nuclear regulation.

https://www.legislation.gov.uk/ukpga/2013/32/contents

[22] UK Government. National Energy System Operator framework document July 2026. Statutory objectives and relationship with government.

https://www.gov.uk/government/publications/national-energy-system-operator-framework-document/national-energy-system-operator-neso-framework-document

[22a] UK Parliament. Energy Act 2023 explanatory notes. Ofgem duties and references to net zero and carbon budgets.

https://www.legislation.gov.uk/ukpga/2023/52/notes/division/3/index.htm

[23] HM Treasury and HMRC. Factsheet Carbon border adjustment mechanism. Domestic carbon pricing, free allowances and border-charge calculation.

https://www.gov.uk/government/publications/factsheet-carbon-border-adjustment-mechanism-cbam/factsheet-carbon-border-adjustment-mechanism

[23a] UK Government. Legislation for a UK Emissions Trading System. Primary powers and auctioning legislation.

https://www.gov.uk/government/publications/legislation-for-a-uk-emissions-trading-system/legislation-for-a-uk-emissions-trading-system

[24] UK Supreme Court. Finch v Surrey County Council [2024] UKSC 20 press summary. Assessment of downstream emissions under environmental assessment regulations.

https://www.supremecourt.uk/cases/press-summary/uksc-2022-0064

[N1] Environment Agency. Decarbonisation readiness in environmental permit applications. Current guidance for relevant applications in England from 28 February 2026, under the 2016 permitting regulations as amended in 2025.

https://www.gov.uk/government/publications/decarbonisation-readiness-in-environmental-permit-applications/decarbonisation-readiness-in-environmental-permit-applications

[N2] UK Government. Capacity Market rules amendments to improve auction liquidity government response. Explains the separate emissions eligibility restriction for unabated coal from October 2024.

https://www.gov.uk/government/consultations/capacity-market-rules-amendments-to-improve-auction-liquidity/outcome/capacity-market-rules-amendments-to-improve-auction-liquidity-government-response

[O1] UK Parliament. Petroleum Act 1998 sections 4A and 4B. Onshore hydraulic-fracturing consent and connected safeguards.

https://www.legislation.gov.uk/ukpga/1998/17/section/4A

[O2] UK Parliament. Infrastructure Act 2015 section 49. Onshore petroleum advice linked to Climate Change Act duties.

https://www.legislation.gov.uk/ukpga/2015/7/section/49

[F1] HM Revenue and Customs. Climate Change Levy guidance.

https://www.gov.uk/green-taxes-and-reliefs/climate-change-levy

[F2] Department for Energy Security and Net Zero. Climate Change Agreements statutory guidance 2026.

https://www.gov.uk/government/publications/climate-change-agreements-statutory-guidance/climate-change-agreements-statutory-guidance-2026-accessible-webpage

Fiscal and procurement sources

[F4] HM Revenue and Customs. Excise Notice 175. Hydrocarbon oil legislation and Carbon Price Support through electricity-generation fuel-duty relief.

https://www.gov.uk/guidance/excise-notice-175-motor-and-heating-fuels-used-to-generate-electricity-relief-from-excise-duty

[F5] Department for Business and Trade. Subsidy Control rules quick guide. Commercial terms, subsidies, modifications, referrals and legal challenge.

https://www.gov.uk/government/publications/subsidy-control-rules-key-requirements-for-public-authorities/subsidy-control-rules-quick-guide-to-key-requirements-for-public-authorities

[F6] Cabinet Office. Procurement Act 2023 guidance documents. Contract scope, award routes, modifications and territorial application.

https://www.gov.uk/government/collections/procurement-act-2023-guidance-documents

[F7] Cabinet Office. Guidance Concession Contracts. Exploitation rights and real operating risk determine the legal classification.

https://www.gov.uk/government/publications/procurement-act-2023-guidance-documents-plan-phase/guidance-concession-contracts-html