

CONSULTATION RESPONSE

An accelerated planning system

Response from Regen and the
Centre for Sustainable Energy (CSE)

12 April 2024

About Regen

Regen is an independent centre of energy expertise with a mission to accelerate the transition to a zero-carbon energy system. We have more than 20 years' experience in transforming the energy system for net zero and delivering expert advice and market insight on the systemic challenges of decarbonising power, heat and transport. Regen is also a membership organisation and manages the Electricity Storage Network – the voice of the UK storage industry. We have over 150 members who share our mission, including clean energy developers, businesses, local authorities, community energy groups, academic institutions and research organisations across the energy sector.

About CSE

CSE is an independent national charity, established in 1979 to tackle climate change and end the misery of cold homes. We undertake practical work to support households and communities to act on energy, alongside original research and analysis to inform local and national policy. We have research expertise in complex data modelling and software engineering; low-carbon planning including zero-carbon building standards; renewable energy; energy regulation and its impact on vulnerable consumers; energy programme evaluation; and the fuel poverty and social distributional impacts of energy policy. CSE has provided consultancy services to planning authorities across England and to private developers, with a particular focus on developing effective policies to facilitate net zero carbon development.

Introduction

In the following response, we set out our concerns with the proposed accelerated planning service. Our primary concern is that the proposals miss any consideration of renewable energy projects. We are concerned that if local planning authorities and statutory consultees, already stretched thin, prioritise commercial applications – albeit for a higher fee – it could severely hamper the efficiency of decision-making processes for renewable energy projects. Notably, the consultation overlooks the underlying resourcing challenges faced by local planning authorities, which urgently need to be addressed if the speed of decision making is to be improved.

To meet the UK’s renewable energy targets, expediting the planning process for such developments is essential. This necessity has been acknowledged within the Nationally Significant Infrastructure Projects (NSIP) framework, where all forms of renewable energy have been designated as a Critical National Priority (CNP). However, similar designation has yet to be extended to renewables applications under the National Planning Policy Framework (NPPF) regime.

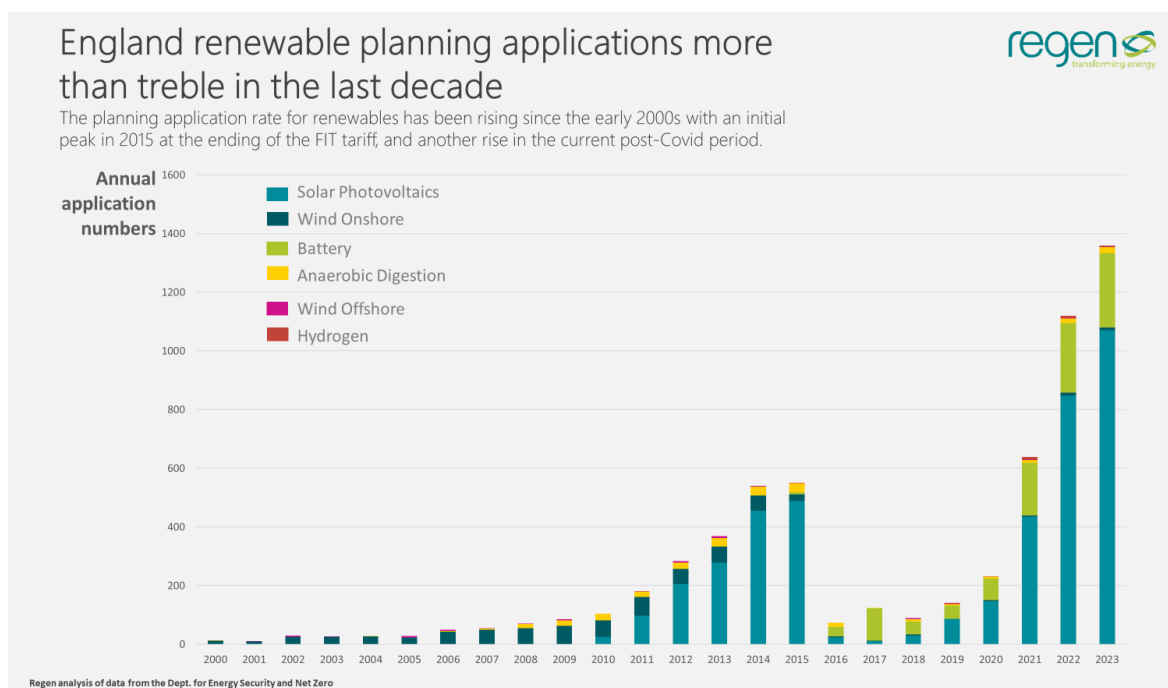
In addition, the interventions and policy reforms to unlock the grid connection queue in the UK will include specific stage gates, where generation and storage projects will need to demonstrate progress in planning (and land agreements). Any additional delays to planning departments registering, reviewing and deciding on renewable energy planning applications could undo the potential solutions developed by DESNZ, Ofgem and the ESO to unblock the large connection queue.

We believe that the introduction of an accelerated planning system presents a crucial opportunity to prioritise renewable energy and net-zero developments. In the subsequent sections, we provide a more comprehensive response, focusing on our key recommendation that an accelerated planning service should prioritise renewable energy and projects aligned with achieving net zero emissions.

The need for an accelerated planning system for renewables

If we are to meet our renewable energy targets, we will have to expect a significant increase in renewable energy planning applications. As depicted in the graph below, the volume of planning applications for renewable energy projects in England has risen notably in recent years and we expect this to continue increasing. The graph also demonstrates the impact of the 2015 policy change for onshore wind, which significantly stalled the development of the technology in England. If footnote 57 of the NPPF is removed in the future, thereby allowing onshore wind development to resume in England, we would anticipate an increase in onshore wind applications, alongside the ongoing rise in submissions for solar and battery storage projects for Local Planning Authorities.

A primary concern arising from this consultation is the potential unintended consequence on the pace of decision making for renewables if Local Planning Authorities are incentivised to prioritise major commercial applications. Instead, we advocate for renewable energy applications to be the key priority of an accelerated planning framework, affording them a similar level of prioritisation as the CNP designation observed at the NSIP level.



The ongoing impact of resourcing challenges

Although the consultation discusses incentivising local authorities for expedited decision making through higher fees, it overlooks the persistent resourcing challenges that make such goals difficult to attain. [Research conducted by the Royal Town Planning Institute](#) identified that between 2013 and 2020, 25% of planners left the public sector. Moreover, [the Local Government Association's 2022 workforce survey](#) revealed that 58% of local authorities in England faced difficulties in recruiting as many planners as they wanted to. These resourcing constraints already directly impact applicants, hindering their ability to initiate pre-application discussions and to engage with local authorities throughout the application process, as well as causing delays in decision making.

While the consultation suggests that higher planning fees could facilitate improvements in internal processes for local authorities, this would necessitate increased resources. Many Local Planning Authorities struggle to attract and retain staff, often due to issues related to pay and career advancement. Therefore, addressing these underlying resourcing challenges is essential to developing an accelerated planning system.

A new performance metric

While the proposed new metric to measure the speed of decision making by Local Planning Authorities appears to be beneficial, our perspective is that this is unlikely to have an impact without investment in the resourcing of Local Planning Authorities. Additionally, the measure enabling applicants to apply directly to the Planning Inspectorate in designated local authorities could put increasing pressure on the Planning Inspectorate, potentially slowing the speed of decision making. Due to the impact of moving workload onto the Planning Inspectorate, this change is unlikely to achieve a long-lasting beneficial impact. Comparatively, addressing underlying resourcing concerns could have a wider, long-lasting impact across the planning system.

The role of statutory consultees

It is important to acknowledge the challenges faced by statutory consultees, in terms of resourcing. While the consultation proposes that the government will use its oversight of statutory consultees to prioritise applications under the accelerated planning service, we are concerned about the potential adverse effects this could have. We are aware that statutory consultees are already constrained and are concerned that if they

are incentivised to prioritise other applications this may impact their ability to respond promptly to renewable energy applications.

Expanding the current simplified written representations appeals process

Overall, we are supportive of expanding the simplified written appeals process if this helps to speed up the appeals process for a range of applications and reduces the workload put upon Local Planning Authorities.

We would be happy to engage in follow-up discussions regarding how the planning process for renewables at the local authority level could be improved. Please contact [Rebecca Windemer](#), Regen's planning and communities lead.



Regen
Bradninch Court,
Castle St,
Exeter
EX4 3PL

01392 494 399
www.regen.co.uk

12 April 2024