



Barker Review of Land Use Planning  
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**Re: Barker Review of Land Use Planning – Interim Report**  
**- E.ON UK Response.**

E.ON UK welcomes the opportunity to comment on the interim report from the Barker Review of Land Use Planning, and would like to reemphasise the critical importance which we place upon the Barker Review delivering proposals that create an efficient and effective planning regime for the UK.

In our response to the Review's Call for Evidence, we suggested that the UK planning regime had three main areas that were having a significant negative effective on our ability to deliver our own business goals as well as the UK's energy policy objectives:

1. Protracted and uncertain timescales;
2. Inconsistency in decisions and interpretation of policy; and
3. Accountability and the process for appealing decisions.

We also suggested that issues specific to electricity networks deserve particular attention.

We welcome the conclusions of the Barker team set out in the Interim Report, which concur with our view, and strongly support the team's proposed next steps for recommendations in the final Review considering: i) efficiency of the planning process; ii) efficient use of land; and iii) flexibility and responsiveness of the system.

However, we would like to take this opportunity to stress the importance of the Barker Review complementing and expanding upon the planning reform work outlined in the recent Energy Review Report to produce a

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complete and consistent planning regime within which the energy industry can operate successfully.

I attach the note sent by the UK Business Council for Sustainable Energy to the Energy Review team on planning issues that summarise the Industry's main issues and recommendations, and which I hope you will find helpful.

We look forward to the Barker Review's final recommendations in November, and to further dialogue with Government and the Barker team on this critical issue.

Yours sincerely

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## **UKBCSE Note to DTI as part of the Energy Review consultation: - Planning Issues**

The UK planning regime is unusually restrictive by international standards. It also lacks transparency, consistency, accountability, and predictability in its process. This is inconsistent with the long-term international competitiveness of the UK economy and, if unchanged, will seriously jeopardise the delivery of the UK's energy policy objectives.

An approach is needed which combines both effective public scrutiny with an efficient, prompt and predictable process for considering planning applications and other applications for development consent which fully reflects at the local level national energy and environmental policy objectives.

The main problems are:

- Whilst major infrastructure projects may have significant benefits nationally, local impacts tend to have a disproportionate weight on decisions. The process by which national policy is translated into local planning opinion is flawed and has little transparency or accountability;
- There is little effective action to ensure national policy 'trickles down' to regional and local policies. This leads directly to inconsistencies in approach and decisions between planning authorities, which deters investment;
- There is a lack of options for developers faced with incorrect decisions or poor performance, other than the highly costly and lengthy public inquiry process;
- Timescales within the planning process are unpredictable, and sometimes excessively lengthy. Statutory response times to decisions or milestones critical to development activities (e.g. the planning decision itself, or agreement of planning conditions, etc.) either do not exist or are often not met.
- In the instances where statutory timescales do exist there are no significant incentives on planning authorities to assess specific projects in a timely or transparent manner;

- The issue of unpredictable and unduly lengthy timescales is exacerbated by insufficient preparedness and resources to deal with major infrastructure projects within planning authorities and statutory consultees. This is particularly apparent where a change in policy occurs bringing a suite of new investments and/or new technologies to the fore (e.g. the Renewables Obligation), or where a 'boom and bust' cycle operates, bringing sudden, but predictable, increases or decreases in the number of investments - and therefore the number of planning applications and associated consultations - being made.

We recommend a number of measures to address these problems:

- A national statement of need in key areas of energy infrastructure investment should be published by the Government to ensure that planning authorities fully understand priorities at a national level. This needs to be supplemented by the active communication of this position to planning authorities and training of planning officers and local councillors involved in the planning process;
- Government should take active steps to ensure that such national policy is translated into regional and local planning policy statements, and an enforcement process created to ensure that this occurs in a timely and efficient manner;
- Planning authorities should have to meet minimum levels of transparency they have to adhere to with the applicant throughout the planning process, in terms of the state of progress of a planning application and access to documents;
- Planning authorities and statutory consultees should be incentivised financially to meet targeted timescales for progressing planning applications; and the current target arrangements that discourage progression of applications once they have overrun their targets should be removed;
- An objective evidence base should be developed by the Government for planners, which encompasses generic issues such as the carbon offset impact of a development. This could be of particular use for specific types of developments where many generic issues are debated

repeatedly (e.g. renewables);

- The appropriate resources in terms of staff numbers and technical expertise should be available to planning authorities and statutory consultees. This should be informed year-on-year by expected long-term industry trends including policy changes and investment cycles;
- Dedicated planning teams should be created for renewables and other energy infrastructure development within Government departments;
- Statutory timescales should be created for all aspects of the planning process, including responses from consultees;
- The appeals process should be reviewed, to allow decisions to be reached in a more cost-effective and time-efficient manner.