

## Fees for planning applications (Closes 18 May)

### Consultation description

This consultation seeks views on proposals to:

- establish a new national default fee schedule, based on 90% of estimated costs, to bring planning fees to a level closer to cost recovery and act as a baseline from which a new local fee setting model will operate
- introduce new fees and restructure existing fee categories in order to reduce complexity for users
- implement a surcharge on planning fees for statutory consultees, set in the region of 10% of the national default fee
- establish the key principles behind local fee setting, as well as seek views on the potential to implement a cap on locally set fees
- review the future role of discretionary services such as Planning Performance Agreements and pre-application advice in light of proposed increases to default fees and the introduction of the local variation model

### POS Response and synopsis

The core proposal to cap planning fees at 90% of cost recovery must be strongly rejected by POS. LPAs are statutory bodies delivering nationally mandated functions, yet year after year they are expected to do more with less, absorb new responsibilities, and respond to increasingly complex applications without the resources required to do so. Against this backdrop, the decision to withhold the final 10% of cost recovery is considered to be a deliberate continuation of structural underfunding. For POS, this is unacceptable. It undermines service delivery, weakens the capacity of planning authorities to meet national priorities, and signals a fundamental lack of respect for the statutory role and professional expertise of LPAs. POS therefore **strongly rejects** the 90% model and maintains that **full cost recovery is the only credible basis for a sustainable, high-performing planning system**.

The proposals do introduce several positive reforms, particularly the simplification of outline, full and reserved matters fees, which will make the system easier for applicants and LPAs to navigate. However, fee caps must be realistic and reflect the true workload involved in long-phased schemes, including inflation and the significant officer time required for EIA development. Heritage-related applications remain substantially under-funded, despite requiring specialist expertise, and this gap must be addressed.

POS supports charging per condition for discharge of conditions, recognising the wide variation in complexity, and agrees that biodiversity gain plans require a dedicated fee to avoid diverting core planning capacity. The introduction of fees for prior approvals currently free of charge, as well as the proposed CAAD and s106A fees, is also supported.

A statutory consultee surcharge is acceptable only if accompanied by enforceable service-level agreements; without these, LPAs will continue to absorb the operational consequences of delayed responses. POS also supports local fee variation up to a 25% cap, with guidance aligned to the principles in Manifesto Background Paper 16. Finally, PPAs and discretionary

charging remain essential tools for managing complex schemes and should continue to play a central role in the system.

## Conclusion

The planning system cannot function on goodwill and structural underfunding. The proposed 90% cost-recovery model is unacceptable and must be replaced with **full cost recovery** as the national default. LPAs need a fee system that reflects the true cost of delivering a modern, responsive, plan-led system. These reforms must strengthen, not weaken, the capacity of planning authorities to deliver high-quality outcomes for communities.

The following table sets out the proposed POS response to the questions included in the consultation.

Question Number	Question	POS response
1	<p>Do you support the proposed National Default Fee Schedule, set at 90% of full estimate cost?</p> <p>Yes / No / Unsure</p> <p>Please explain your reasoning.</p>	<p>Whilst POS supports the Government’s move towards cost recovery, POS emphasises that this must mean 100% cost recovery. We therefore strongly oppose the proposal set out in the consultation for a 90% cost-recovery model.</p> <p>The planning system cannot function on goodwill and structural underfunding. The proposed 90% model is unacceptable and must be replaced with full cost recovery as the national default. LPAs need a fee regime that reflects the true cost of delivering a modern, responsive, plan-led system. These reforms must strengthen—not further weaken—the capacity of planning authorities to deliver high-quality outcomes for communities.</p> <p>The decision to set fees at 90% of actual cost is not a technical adjustment; it is a political choice to underfund the planning system. There is no evidence-based justification for withholding the final 10%. The suggestion that this shortfall will “incentivise efficiency” is misconceived and frankly insulting to the professionalism of LPA planning teams.</p> <p>This concern is compounded by the fact that any additional income generated through increased application fees cannot be used to support councils’ local plan teams. The planning process relies on well-resourced and capable whole local planning authorities. Ring-fencing income away from plan-making risks further reducing already stretched</p>

		<p>funding and undermines the very foundations of a plan-led system.</p> <p>LPAs already operate under severe financial pressure, with workloads and statutory obligations shaped by factors entirely outside their control. To require authorities to subsidise the planning system from local budgets—while simultaneously demanding higher performance—is indefensible.</p> <p>Full cost recovery must be the baseline, not an aspiration LPAs must earn. This position applies to all subsequent questions referencing the 90% model.</p> <p>In addition, POS continues to advocate for an appropriately funded plan-making system, recognising that a strong, up-to-date Local Plan is essential to delivering national priorities, community outcomes, and investor confidence.</p>
2	<p>Are there any proposed fees in the National Default Fee Schedule that you consider to be unrepresentative of 90% of estimated full cost levels for LPAs (either too low or too high)?</p> <p>Yes / No / Unsure</p> <p>If yes, please specify which application categories and provide evidence to support your view, including what you believe the fee should be.</p>	<p>Yes. POS believes that wherever an authority has to process and determine an application they should be entitled to recover their full costs.</p> <p>Applications for listed building consent and conservation area consent too low.</p> <p>Where works are proposed to a protected building, specialist advice is required to assess and shape an appropriate scheme. Local authorities must also draw on specialist expertise to assess such proposals and should be reimbursed accordingly. When handled correctly, these works can enhance the value and long-term viability of the heritage asset, delivering wider public benefit.</p>
3	<p>Do you support the proposed changes to the fee structures for outline, full and reserved matters applications for residential and non-residential development as set out in the proposed National Default Fee Schedule?</p>	<p>Yes.</p> <p>The current system has become too complex and difficult for both applicants and LPAs to navigate. Simplification is welcome.</p>

	<p>Yes / No / Unsure</p> <p>Please explain your reasoning.</p>	
4	<p>What further changes, if any, do you think should be made to the structure of fees for outline, full and reserved matters applications?</p> <p>In your response, you may wish to comment on:</p> <ul style="list-style-type: none"> <li>• whether a more simplified banding structure would be preferable to increments per unit or per area</li> <li>• how fees could better reflect varying site characteristics or levels of complexity</li> <li>• whether the current approach to mixed use development fees should be simplified</li> <li>• how fees should operate for large multi-phase developments, including whether it remains appropriate to have maximum fee levels or caps for reserved matters applications</li> <li>• whether an additional band or higher fee should apply to applications requiring EIA</li> </ul> <p>Please provide evidence where possible.</p>	<p>Fee caps for reserved matters must reflect the real work involved, particularly for long-phased schemes where inflationary impacts accumulate.</p> <p>Fees for EIA development must also reflect the substantial complexity and officer time required when dealing with these types of applications.</p>
5	<p>Do you support the proposed changes to the fee structures for</p>	<p>Yes</p>

	<p>applications for agricultural development as set out in the proposed National Default Fee Schedule?</p> <p>Yes / No / Unsure</p> <p>Please explain your reasoning.</p>	
6	<p>Do you support the proposal that PiP applications should attract a flat fee for 2 bands?</p> <ul style="list-style-type: none"> <li>• PiP applications for developments of up to 9 dwellings - £825</li> <li>• PiP applications for developments of 10 to 49 dwellings - £3150</li> </ul> <p>Yes / No / Unsure</p> <p>If no, what alternative approach would you suggest and why? Please provide evidence to support your view.</p>	<p>We support the two-band structure and the proposed fees (£825 and £3,150).</p>
7	<p>Do you agree with the proposed fee level for PiP applications for:</p> <p><b>a) developments of up to 9 dwellings - £825?</b></p> <p>Yes / No / Unsure</p> <p>If no, what do you consider to be an appropriate fee? Please provide evidence to support your view.</p> <p><b>b) developments of 10 to 49 dwellings - £3,150?</b></p> <p>Yes / No / Unsure</p> <p>If no, what do you consider to be an appropriate fee? Please provide evidence to support your view.</p>	<p>We support the two-band structure and the proposed fees (£825 and £3,150).</p>

8	<p>Do you think the three-band fee structure currently used for section 73 applications remains appropriate?</p> <p>Yes / No / Unsure</p> <p>If no, what changes would you propose and why? Please provide evidence to support your view.</p>	Yes
9	<p>Should section 73 and section 73B applications be charged using the same fee structure?</p> <p>Yes / No / Unsure</p> <p>Please explain your reasoning.</p>	Yes
10	<p>Do you think the fee for discharging conditions should be charged per condition rather than per application?</p> <p>Yes / No / Unsure</p> <p>If yes, what do you consider to be an appropriate fee per condition? Please provide evidence to support your view.</p>	<p>Yes.</p> <p>Conditions vary significantly in complexity and number, with more complex proposals often having more conditions. Charging per condition is more accurate and a fairer approach to the discharge process which helps reflect the complexity of proposals.</p>
11	<p>Should applications for the approval of biodiversity gain plans be subject to a separate fee to reflect the specific work involved?</p> <p>Yes / No / Unsure</p> <p>If yes, what do you consider to be an appropriate fee level? Please provide evidence to support your view.</p>	<p>Yes.</p> <p>The approval of Biodiversity Gain plans require specialist expertise, without a dedicated fee, this work will displace already limited LPA resource and capacity.</p>

12	Do you have an alternative suggestion on how the fee structure for discharge of conditions could be improved?	No further comment.
13	Do you support the proposal to apply a flat fee of £310 for all other existing prior approval applications that are currently free of charge as well as the proposed prior approval under Class B of Part 15 (if brought forward)?  Yes / No / Unsure  Please explain your reasoning.	Yes. These applications consume LPA resources and must be included in cost-recovery proposals.
14	Do you agree with the proposed fee for CAAD applications of £964?  Yes/No/Unsure  If no, what do you consider to be an appropriate fee? Please provide evidence to support your view.	Yes
15	Do you support the introduction of a new national default fee for section 106A applications?  Yes/No/Unsure  If yes, what would represent an appropriate structure and fee(s)? Please provide evidence to support your view.  If you do not support this proposal, please explain why.	Yes
16	Are there any other existing fee categories not mentioned above that you believe would benefit from restructuring?	POS believes that wherever an authority has to process and determine an application they should be entitled to recover their full costs.

	<p>Yes / No / Unsure</p> <p>If yes, please specify which categories and explain how you think they should be improved.</p>	
17	<p>Do you agree with our working proposal that the planning fee surcharge should be in the region of 10% of the national default fee (subject to further policy development and consultation)?</p> <p>Yes / No / Unsure</p> <p>Please explain your reasoning.</p>	<p>Yes—but only if statutory consultees are subject to enforceable service-level agreements. Without this, LPAs will continue to bear the consequences of delayed responses.</p> <p>Please see POS response to consultation on Reforms to Statutory Consultee system in Planning – Submitted 22 December 2025: <a href="#">POS response to reform of Statutory consultee system for Planning (1).pdf</a></p> <p>POS in its Manifesto Background Paper 16 (Improving LPA Funding) has said: Government has recognised that the current application fees for discharging conditions and dealing with amendments (s96a, s73 and, hopefully soon, s73B) are inadequate and are proposing that they be increased. It is important that this is on a cost-recovery basis and the success of this needs to be kept under review with empirical evidence: <a href="#">POS-MBP16-Improving LPA Funding.pdf</a></p>
18	<p>Do you have any comments on how local fee setting will operate? In particular, is there any additional information that you would wish to see covered through guidance?</p>	<p>POS refers to its <a href="#">Manifesto Background Paper 16 (Improving LPA Funding)</a>, which sets out the principles required for effective local fee setting.</p> <p><a href="#">POS-MBP16-Improving LPA Funding.pdf</a></p>
19	<p>Do you think local fee variations should be capped? If so, what level would be appropriate - 15%, 25% of the national default fee, or another figure?</p> <ul style="list-style-type: none"> <li>• yes - 15%</li> <li>• yes - 25%</li> <li>• yes - other (please specify)</li> <li>• no</li> </ul>	<p>Yes – 25% is appropriate.</p>

	<ul style="list-style-type: none"> <li>• unsure</li> </ul> <p>Please explain your reasoning</p>	
20	<p>In the context of localised planning fees, what are your views on the future role of PPAs, pre-application advice and other discretionary charging regimes?</p> <p>Please provide any suggestions, experiences or evidence to support your view.</p>	<p>POS supports their continued use where appropriate.</p>
21	<p>Do you have any views on how the proposals in this consultation might affect you, the group or business you represent, or others – particularly those with protected characteristics?</p> <p>If so, please explain who might be affected and how.</p> <p>Is there anything that could be done to mitigate any impact identified?</p>	<p>No specific impacts identified.</p>