

Fees for Planning Applications Consultation
Third Floor, Fry Building
Ministry of Housing, Communities and Local Government
2 Marsham Street
London
SW1P 4DF

18th May 2026

Response submitted by email only to: planningfees@communities.gov.uk

Dear Sir / Madam,

Re: Fees for Planning Applications Consultation

About the LPDF

The Land Planning and Development Federation (LPDF) seeks to represent the UK's leading land promoters, home builders and commercial developers. LPDF members support the housebuilding and commercial development sectors by promoting sites through the planning system, providing "shovel ready" land with a planning permission which can facilitate the delivery of infrastructure and serviced land parcels.

The LPDF seeks to actively engage with government on planning, housing and commercial development policy and to educate the wider public on the social, environmental and economic benefits of development through an evidenced based approach.

The LPDF encourages its members to deliver well designed, high quality, sustainable places which deliver a mix of housing types and tenures, commercial spaces and community uses that have a positive social, environmental, and economic impact.

Our key values include:

- Working in a positive and cooperative way with central and local government and key stakeholders, to deliver a planning system capable of supplying the homes and employment space we need.
- Promoting research and an evidence-led approach to policy development.



- Increasing the supply of new homes to meet demand and make home ownership a realistic possibility for all those who aspire to it.
- Ensuring that we build the affordable homes of all types and tenures that this country so desperately needs.
- Delivering new employment space to meet demand from businesses and support economic growth.
- Championing the impact of increased housing delivery on reducing intergenerational unfairness.
- Creating well designed, high quality and sustainable places to live and work.
- Educating and informing about the social, environmental and economic benefits of development.
- Supporting diversity of delivery in the market and championing SME developers.
- Promoting diversity and inclusivity within the sector.

General Comments

The LPDF welcomes the Government's desire to support the functions of Local Planning Authorities (LPAs), ensuring that they have the capacity and resources to process planning applications efficiently and effectively. As shown in our research 'How Long Is a Piece of String'¹ undertaken by Lichfields, it now takes on average two years to process an outline application. This situation is unacceptable for all parties and is one which will severely hamper the Government's ability to achieve its objectives of delivering 1.5 million homes.

The LPDF are currently undertaking a follow-up piece of research with Lichfields which has the working title 'Shortening the Piece of String'. This research is focussed on identifying where the major delays in the processing of planning applications is occurring and how those barriers can be lessened, or removed, to shorten planning application determination periods significantly. The LPDF will share this research with MHCLG as soon as it is published.

The LPDF and its members raise no objection to the overall proposal to increase planning application fees so that they allow for 90% cost recovery for the processing of planning applications. We also strongly support the ringfencing of these fees for reinvestment into the planning service within LPAs, so that additional resources can be procured and continuous

¹ [How Long is a Piece of String](#)



improvement in the efficiency and effectiveness of the planning service can be delivered. However, the Government should also be using this opportunity to reduce the costs associated with submitting and determining planning applications wherever possible, in order to reduce the pressure on the public purse, reduce costs and risk for developers in order to encourage more participants in the market (especially SMEs), and to ensure that the system is proportionate and efficiently operated.

The LPDF do have some significant concerns that there are a number of missed opportunities which the Government could have taken the opportunity to address through this consultation, which would have led to significant additional benefits for both applicants and LPAs. It is the LPDF's view that the Government should revisit these additional elements, which are detailed below, to ensure that the reshaping of planning fees is as impactful as possible. It is the LPDF's view that these will assist the Government in achieving their overall objectives significantly.

Firstly, the Government should have tied the review of planning application fees to a full review of the application validation process and the rationalisation of the supporting planning documents that are required for planning application submissions. This is particularly pertinent to small and medium sized schemes (under the new definitions contained in the draft NPPF) and for outline applications. The greater the rationalisation process, the less documents are needed to support applications. This reduces the cost of applications for applicants and reduces the workload and cost of processing those applications for LPAs. This is a win-win situation and is reasonably simple to achieve through a thorough review of the need for each supporting document for various planning applications, and the subsequent publication of a standardised national validation checklist for various types of planning applications.

This would also deliver additional benefits for applicants, reducing the cost of initial planning applications considerably, thereby freeing up cashflow resources to invest in further planning applications, rather than having to await the return on capital employed from their current applications before being able to reinvest in others. It would also allow LPAs to better utilise their resources, making the processing of planning applications quicker and allowing them to process a greater number of applications in a given period, with a consequential increase in application fee income from a greater number of planning applications being submitted.

The LPDF therefore see this missed opportunity as too good to pass up, as it benefits all parties involved in the planning process, including the Government who will achieve increased delivery.



The second missed opportunity is that the Government have not reviewed all of the costs that are encountered by applicants when submitting planning applications. Pre-application advice and the use of Planning Performance Agreements (PPAs) are both services which applicants are encouraged to use to improve service delivery and to ensure that the processing of their planning application is as efficient as possible. However, there are huge variations in the quality and implementation of these services and some of the costs that are attached to these are significant. This can cause viability issues, particularly from SMEs.

There are examples of LPAs refusing to correspond with applicants unless pre-application advice has been sought, for which a significant charge is made. This practice is highly likely to be unlawful, however members frequently report this behaviour from LPAs. The delays which are being experienced in the pre-application process can also be significant, as applicants await meeting dates with the most appropriate range of organisations for the application represented. The feedback and outcome from these meetings are also highly variable and often of limited value to the applicant. This could be addressed through a review of the pre-application process and the issuing of Government guidance on how LPAs should conduct this process effectively. This should include a set format for the structure of these meetings, for the output from the pre-application process and for the timeframes which should be attached to the delivery of this process. If the pre-application process is left without a formal timescale attached, then the speeding up of the part of the decision-making process which is monitored (validation to determination), could be significantly hampered by a slow pre-application process which is not monitored, thereby leading to decision times which are no quicker.

PPAs are often used by LPAs, particularly for larger scale applications, and developers often take-up this offer in order to try and agree timeframe and quality of service criteria, to assist in the processing of their applications. As there is no set fee for PPAs, fees vary considerably, with some of the costs being substantial. There is also no guarantee that any of the timeframe or service quality assurances will be delivered.

If the objective of the review of Planning Application Fees is to ensure that LPAs achieve 90% cost recovery for the processing of planning applications, then these additional costs for services such as pre-application advice, should also be taken into account. Our suggestion is that there should be a nationally set fee for pre-application advice, and the use of a PPAs should be limited to large scale schemes above a certain threshold (e.g 1,000 homes or above). These fees could be varied locally through the same process as proposed for the planning application fee. This would ensure that costs are kept at a reasonable level, are transparent and do not negatively impact SME developers. There should also be a nationally



set template for any PPAs which are required, to ensure a consistent approach across the country.

Finally, the Government have missed a significant opportunity to tie the review of planning application fees into significant performance enhancement measures which can be monitored and which LPAs are expected to achieve as a result of the increased resources they will receive through this process. Nationally set Key Performance Indicators (KPIs) which are monitored by LPAs and reported to Government on a regular basis, would focus LPAs on achieving significant increases in service delivery, would shorten determination periods and would allow Government to ensure that the increased resources are being used to good effect by LPAs. These KPIs should be made publicly available and any failure to deliver against them should be able to be addressed by Government through an appropriate mechanism.

The overall outcome of this whole review process is to ensure that LPAs have the necessary resources to process planning applications more efficiently, so that determination periods are significantly shortened leading to faster decisions and consequently faster delivery. Without such checks and balances being introduced, the Government will have no way of ensuring that the extra resources are being used to best effect.

These are the major concerns which the LPDF and its members have about the current consultation, and they are the ones which we consider the Government needs to address as a matter of urgency, before the opportunity is lost once the new system is introduced. As a result of these additional elements, the Government could ensure that all parties involved in the planning application process benefit from the new system, that LPAs get the resources they need to operate an efficient and effective service, that applications face reduced costs and better service delivery and that Government gets faster decisions and subsequently faster delivery.

The remainder of our detailed views are set out below in response to the questions set within the consultation document. However, it should be noted that any changes which are made to the fee structure must ensure, that additional charges which have been implemented by some LPAs, such as charging for invalid applications, are not allowed under the new system. This should be made clear in the new guidance when it is issued. Additionally, the LPDF, along with other significant organisations, have always advocated for a return to the free-go application process which would allow the applicant to work through the outstanding issues with the case officer, through the determination period, rather than ending up at Appeal. When the free-go process was in operation, it often encouraged LPAs to find ways to support schemes, once the applicant had addressed the outstanding issues.



Questions

Question 1 - Do you support the proposed National Default Fee Schedule, set at 90% of full estimate cost?

Yes – The LPDF raises no objection to the proposal to set the National Default Fee Schedule at 90%. As set out in the consultation paper, setting the level at 90% ensures that LPAs are able to significantly increase their resources to help them to improve service efficiency and effectiveness. It also incentivises LPAs to make service improvements and efficiencies for continuous improvement. The caveats to this position are set out in the LPDF's general comments above in relation to supporting documents rationalisation, the need for a total cost review (including pre-application and PPA charges) and the introduction of performance management measures.

Question 2 - 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)?

No.

Question 3 - 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?

No – As set out in our general comments above, the LPDF consider that the cost of processing outline planning applications could be significantly reduced through a thorough rationalisation of the information required to support an application. This would cut costs for applicants, benefitting SMEs especially, and would reduce the workload for LPAs and the costs associated with processing such applications.

Question 4 - What further changes, if any, do you think should be made to the structure of fees for outline, full and reserved matters applications?

Please see our general comments above regarding the additional changes that we consider could be made to make the planning application fee review more effective. It is considered that fees should be charged on a unit basis, to make the system simple and transparent. There should also be a maximum fee level set at a national level to avoid excessive charging which could impact the overall viability of major schemes.



Question 5 - Do you support the proposed changes to the fee structures for applications for agricultural development as set out in the proposed National Default Fee Schedule?

The LPDF has no comments to make on this question.

Question 6 - Do you support the proposal that PiP applications should attract a flat fee for 2 bands?

Yes. PiPs are currently underutilised as a route to securing an agreement in principle for certain proposals. They should be quick and easy to secure, but there is evidence that they are not prioritised by LPAs and applicants face significant delays in the processing of such applications. If the proposed charges lead to a significant improvement in decision timeframes, then this is supported and may make the use of PiPs more prevalent. As with other elements of the proposals to increase fees, the charging for PiPs should be linked to performance monitoring KPIs to ensure that LPAs are improving service delivery as a result of the increased resources.

Question 7 - Do you agree with the proposed fee level for PiP applications for: a) developments of up to 9 dwellings - £825, b) developments of 10 to 49 dwellings - £3,150?

Yes.

Question 8 - Do you think the three-band fee structure currently used for section 73 applications remains appropriate?

Yes.

Question 9 - Should section 73 and section 73B applications be charged using the same fee structure?

Yes. This keeps things simple.

Question 10 - Do you think the fee for discharging conditions should be charged per condition rather than per application?

No – To keep things simple, charges for the discharge of condition should be made per application. If fees were charged per condition, this could have the unintended consequence of increasing the numbers of conditions attached to permissions by LPAs.

The rationalisation of the number of conditions attached to planning permissions is a further process improvement that the Government needs to implement, in order to reduce the cost and workload for both applicants and LPAs, and to speed up delivery. At present, LPAs often attach unnecessary conditions to permissions, especially those relating to other regulatory



regimes. A rationalisation process, which also should include the issuing of a set of model conditions, would make the planning process significantly more efficient.

Question 11 - Should applications for the approval of biodiversity gain plans be subject to a separate fee to reflect the specific work involved?

The LPDF do not object to a potential charging regime for BNG plans, as long as the fees are justified, appropriate, of a scale which reflects the work involved and leads to service improvements in the speed of determination of applications.

Question 12 - Do you have an alternative suggestion on how the fee structure for discharge of conditions could be improved?

No.

Question 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.

Question 14 - Do you agree with the proposed fee for CAAD applications of £964?

The LPDF have no comments to make on this question.

Question 15 - Do you support the introduction of a new national default fee for section 106A applications?

Yes. As with the other questions regarding the introduction of new or increase fees, there should be a set of KPIs relating to the S106A application process which are monitored on a regular basis, to ensure that the fees are being used to improve service delivery.

Question 16 - Are there any other existing fee categories not mentioned above that you believe would benefit from restructuring?

No.

Question 17 - 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)?

No. There is no justification for the setting of a planning fee surcharge of 10% for national statutory organisations. This is especially the case as it is not accompanied by any expectation on the use of this fee to improve service delivery by those organisations.



Any surcharge which is introduced must be accompanied by a detailed set of criteria which set out what is expected of each organisation that is in receipt of the additional fee. This must include their involvement, where relevant, in any pre-application process, the timely delivery of advice following the pre-application process, meaningful engagement during the determination period of the application, and a set deadline for formally responding to planning applications. As with the other elements of the proposals, KPIs should be introduced to ensure that national statutory organisations are performing as expected, following the introduction of the fee, with a suitable ability to scrutinise their performance and with pecuniary measures if they fail to improve delivery.

This element of the consultation needs careful consideration and the LPDF welcome the recognition that further consultation on more detailed proposals for a planning fee surcharge will be undertaken in due course.

Question 18 - 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?

Any local fee variation from the national default scheme must be clearly justified through robust evidence, which is transparent and which can be scrutinised by all who engage in the planning system, before they are introduced. There should be a period of consultation undertaken by an LPA if they are wishing to introduce a variation, including on the evidence base which is being used to justify the fee increase.

As it is envisaged that fees should be reviewed on a regular basis, the Government could set out that this should be done through the Local Plan preparation process. This would have the advantage of ensuring that any local fees set are justified, as they could be scrutinised through the consultation and examination processes. It would also provide an additional incentive to LPAs to maintain an up-to-date local plan.

It is recognised that the consultation proposes a check and balance in the introduction of any local fee variation through the potential intervention by the Secretary of State. This is welcomed. However, there should also be an avenue whereby any local fee variation that appears to be unjustified by the evidence, can be raised with the Secretary of State by an interested party, before the fee is introduced. This system will help the Government to be kept fully informed about the implementation of the variation process.



Question 19 - 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?

Yes. Local fee variations should be capped at 15% of the national default fee to avoid LPAs justifying significant increases in fees which would have a disproportionate impact on SME developers.

The cost of planning applications, even for small schemes, is currently significant, often above six figures. For an SME developer, this is a substantial risk and ties up more of their cashflow in each planning application. With determination periods lengthening, this means that SME developers often are reliant upon a very small number of planning applications within the system, so anything that can be done to either reduce the cost of these applications, or speed up their determination (preferably both), would assist greatly in them being able to reinvest in new schemes and grow their businesses.

Capping any local variation to the national default scheme to 15%, would help to limit the impact of the proposed increased costs on SME developers and would help to diversify the delivery market and increase the market share of SME developers.

Question 20 - 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?

Pre-application advice and the use of Planning Performance Agreements (PPAs) are both services which applicants are encouraged to use to improve service delivery and to ensure that the processing of their planning application is as efficient as possible. However, there are huge variations in the quality and implementation of these services and some of the costs that are attached to these are significant, which can cause viability issues, particularly for SMEs.

PPAs are currently used as a way of supplementing planning application fees when the standard application fee was known not to cover the cost to the LPA determination process for that application. As the Government are proposing to implement 90% cost recovery application fees, there should no longer be a need to use of any PPAs. This would significantly simplify the process.

PPAs are regularly used by LPAs for large-scale applications and developers often take-up this offer in order to try and agree timeframe and quality of service criteria, to assist in the processing of their applications. If the Government were minded to continue to allow the use of PPAs for planning applications, following the introduction of cost recovery fees, then these should only be used for applications of a significant scale e.g. 1,000 homes or above.



Question 21 - 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?

The introduction of increased planning application fees reflecting close to full cost recovery for LPAs could, if implemented properly, significantly benefit our members through better quality decision making and a more efficient planning application determination process. However, this has to be done taking into account our comments made in the general comments section above in order to avoid this proposal having a detrimental impact on SME developers and/or leading to increased costs, without a corresponding increase in service quality or performance.

I hope that you find this response helpful and if you require any further information, please do not hesitate to contact me.

Yours faithfully



Phill Bamford

Policy Director

