



## Consultation response form - Proposals for changes to planning application fees in England

We are seeking your views on the following questions on the Government's proposal for changes to planning application fees in England. **If possible, we would be grateful if you could please respond by email.** Alternatively, we would be happy to receive responses by post.

Email responses to: [julian.wheeler@communities.gsi.gov.uk](mailto:julian.wheeler@communities.gsi.gov.uk)

Written responses to:

Julian Wheeler  
Communities and Local Government  
Zone 1/J1  
Eland House  
Bressenden Place  
London  
SW1E 5DU

### (a) About you

#### (i) Your details

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Position:	Head of National Planning Advice
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<sup>1</sup> CLG (2010) Proposals for changes to planning application fees in England: Consultation document (see: [www.communities.gov.uk/planningandbuilding/planning/planningpolicyimplementation/planningfeesconsultation](http://www.communities.gov.uk/planningandbuilding/planning/planningpolicyimplementation/planningfeesconsultation))



- |                          |                          |
|--------------------------|--------------------------|
| Yorkshire and The Humber | <input type="checkbox"/> |
| North East               | <input type="checkbox"/> |
| London                   | <input type="checkbox"/> |
| All of England           | x                        |
| Other (please comment)   | <input type="checkbox"/> |

**(vi) Would you be happy for us to contact you again in relation to this consultation?**

- |     |                          |
|-----|--------------------------|
| Yes | x                        |
| No  | <input type="checkbox"/> |

## (b) Consultation questions

### Question 1:

1. **Do you agree that each local planning authority should be able to set its own (non-profit-making) planning application fee charges?**

- |                                   |                          |
|-----------------------------------|--------------------------|
| <b>Strongly Agree</b>             | <input type="checkbox"/> |
| <b>Agree</b>                      | <input type="checkbox"/> |
| <b>Neither agree nor Disagree</b> | x                        |
| <b>Disagree</b>                   | <input type="checkbox"/> |
| <b>Strongly Disagree</b>          | <input type="checkbox"/> |

Explanation/Comment:

n/a
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### Question 2:

2. **Do you agree that local planning authorities should be allowed to decide whether to charge for applications that are resubmitted following withdrawal or refusal?**

- |                                   |                          |
|-----------------------------------|--------------------------|
| <b>Strongly Agree</b>             | <input type="checkbox"/> |
| <b>Agree</b>                      | <input type="checkbox"/> |
| <b>Neither agree nor Disagree</b> | x                        |
| <b>Disagree</b>                   | <input type="checkbox"/> |
| <b>Strongly Disagree</b>          | <input type="checkbox"/> |

Explanation/Comment:

n/a
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### Question 3:

3. **Do you agree that local planning authorities should be able**

**to set higher fees for retrospective planning applications?**

- Strongly Agree**   
**Agree**   
**Neither agree nor Disagree**   
**Disagree**   
**Strongly Disagree**

Explanation/Comment:

n/a

**Question 4:**

- 4. Are there any development management services which are not currently charged for but should require a fee?**

- Yes**   
**No**

Explanation/Comment:

English Heritage has carefully considered whether it would be appropriate for listed building consent and conservation area consent applications to incur a fee. We appreciate that charging might allow local authorities to recover costs of processing applications and specialist conservation advice. However, applications for listed building and conservation area consents are often submitted at the same time as planning applications for the same development which also require specialist conservation advice for which the lpa can recover costs. To charge for listed building and conservation area consents might therefore be seen as charging twice. In those cases where planning applications are not submitted at the same time, listed building consent is required for alterations which are either 'permitted development' or internal alterations which would not require any permissions or consents if the building was not listed, and conservation consent is only required where a conservation area has been designated. Moreover, a level of fee that might reflect the costs of processing and specialist advice is likely to be disproportionate for small alterations. Designation incurs the need for these applications, but owners cannot opt out of having their buildings listed or located within a conservation area, and it is in the public interest that these buildings and areas are conserved through appropriate maintenance, adaptation and re-use. English Heritage therefore agrees with the position in the consultation paper that charging would not be appropriate.

Whilst it might be argued that the decision to charge or not to charge is one to be taken at a local level, designated assets hold a national value and therefore the decision on whether or not to charge should also be taken nationally.

**Question 5:**

5. **Are there any development management services which currently require a fee but should be exempt from charging?**

Yes   
No

Explanation/Comment:

**Question 6:**

6. **What are the likely effects of any of the changes on you, or the group or business or local authority you represent?**

Comments:

None as proposed

**Question 7:**

7. **Do you think there will be unintended consequences to these proposals?**

Yes   
No

Comments:

**Question 8:**

8. **Do you have any comment on the outcomes predicted in the Impact Assessment, in particular the costs and benefits (See Annex B)?**

Yes

**No** n

Comments:

If you would like this document in a different format, please contact  
our Customer Services department:  
Telephone: 0870 333 1181  
Fax: 01793 414926  
Textphone: 01793 414878  
E-mail: [customers@english-heritage.org.uk](mailto:customers@english-heritage.org.uk)