



The  
**London Forum**  
of Amenity & Civic Societies

## Fees for planning applications

### Response from the London Forum of Amenity and Civic Societies

#### Question 1

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

Yes / **No** / Unsure

Please explain your reasoning.

*The current annual shortfall in funding is estimated to be £330 million. This shortfall is not evenly distributed, but there is no information on how it is distributed across LPAs.*

*Evidence suggests that costs, and thus shortfalls, in London are higher than in the rest of the country. Staff and accommodation are higher, and many London LPAs deal with a high proportion of cases with heritage issues arising from conservation areas and the number of listed buildings, for which no fees are payable for the additional assessment that is needed. The complexity of high-density urban projects which require more extensive consultation and technical specialist input also give rise to higher costs.*

*The lack of evidence and of transparency about variations in costs across LPAs means that blanket adoption of the National Default Fee Schedule based on estimates of average – a median would be preferable - costs across the country would be inequitable and could do significant damage to the efficiency and effectiveness of the planning system in some LPAs, especially in London. We believe that many London LPAs will have to adopt local fee setting to avoid such dangers.*

#### 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?

Yes / No / **Unsure**

Please explain your reasoning.

*Lack of evidence and analysis of the cost data available to the Government. But we do not believe the rates specified would recover anything like 90% of the costs for many London boroughs*

## 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?

In your response, you may wish to comment on:

- whether a more simplified banding structure would be preferable to increments per unit or per area
- how fees could better reflect varying site characteristics or levels of complexity
- whether the current approach to mixed-use development fees should be simplified
- 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
- whether an additional band or higher fee should apply to applications requiring EIA

Please provide evidence where possible.

*For each category there should be a comparable average or median cost for London LPAs so that the shortfall can be apparent.*

## 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?

*The principles seem reasonable, though guidance will be needed for LPAs in implementing them fairly and effectively*