



UK Government

Changes to Energy Infrastructure Planning Application Fees

Consultation Response Summary



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Executive Summary

The Department for Energy Security and Net Zero (DESNZ) consulted between 16 December 2025 and 1 February 2026 on proposed changes to energy infrastructure planning application fees that would introduce full cost recovery for our planning delivery service. The consultation sought views on the proposed fixed fee model, alternative charging approaches, fee review cycles, impacts on applicants and consumers, and implementation considerations. A total of 26 responses were received from a range of stakeholders, including but not limited to, electricity and gas networks, renewable energy companies, land agencies, planning consultancies, and trade associations.

Most respondents supported the principle of cost recovery, recognising the need for DESNZ to have sustainable resourcing to deliver planning functions in the context of increasing application volumes and wider Clean Power 2030 objectives. In many cases this support was qualified, with respondents emphasising that fees be transparent, proportionate, and clearly evidenced with increases in fees accompanied by demonstrable improvements in service delivery. Respondents also raised concerns about potential duplication with existing charges payable to other bodies, and about the cumulative cost burden on applicants operating across multiple regulatory regimes.

The fee model proposed for a fully cost-reflective charging regime was a “fixed fee model”, identified by the department to provide a predictable and administratively efficient charging structure. Views on this model were mixed. Some respondents highlighted the benefits of a fixed fee approach, which included its predictability, administrative simplicity, and ease of budgeting. However, most respondents expressed concerns about proportionality, noting that applications vary significantly in scale, complexity, and resource requirements. Where support was provided for a fixed fee model, in many cases it was conditional on regular reviews and adjustments to ensure fees remain fair and proportionate over time.

This issue of proportionality and complexity was raised specifically in relation to Planning Act 2008 applications for Development Consent Orders (DCOs). Respondents argued that a single fixed fee could disproportionately affect smaller or less complex projects, as well as emerging technologies. Alternative models that were suggested included segmentation by technology-type or tiered fees.

Respondents also raised a range of impact considerations, including potential effects on investment decisions, on smaller developers, on applicant operational strategies and the risk of costs being passed through to domestic and non-domestic consumers.

A number of respondents highlighted specific concerns relating to increased fees for Necessary Wayleave applications, which could result in a knock-on effect setting a new baseline compensation level for land rights negotiations involving voluntary wayleaves. This impact could cause significant additional cost burden to network operators where these expenses could directly impact energy consumers through being passed on to bills.

The majority of respondents were concerned about the timing of implementation, arguing that the proposal to apply the changes from this summer (2026) was too soon and that it would make sense to have better alignment with wider planning and land rights reforms that the government was also taking forward, but which would not be in place to this timescale.

Across the consultation, respondents consistently expressed the need for transparency and engagement.

Next Steps

Following careful consideration of consultation responses, DESNZ has decided that changes to energy infrastructure planning application fees will now take place in the 2027/28 financial year (FY) rather than this summer.

This will enable the department to undertake further work to review and consider the key themes raised through the consultation responses, with particular focus on the model for applying charges to Development Consent Orders and Necessary Wayleave applications. During this period, DESNZ will also consider wider reforms to the planning and consenting system, and how these reforms may influence fee arrangements and implementation timelines. This includes aligning with changes being taken forward through the *Electricity Network Infrastructure: Consents, Land Access and Rights* consultation.

The department remains fully committed to a cost-reflective charging regime and notes that most respondents to the consultation support this in principle. We will utilise the coming months to carry out reviews, including engaging with stakeholders on their concerns and potential alternative models, ahead of the new implementation date in FY 2027/28. If you would like to be added to the distribution list for future communications, please email planningdeliveryfees@energysecurity.gov.uk.

The department would like to thank all respondents to the consultation.

Introduction

Responses Received and Respondent Categories

DESNZ consulted between 16 December 2025 and 1 February 2026 on the proposed changes to energy infrastructure planning application fees. A total of 26 responses were received from organisations across the energy sector. There were 15 multiple choice questions, where respondents were asked to choose from a range of responses. The remaining 27 questions were ‘open text’ questions, each response was individually read, analysed and summarised. Respondents were not required to respond to all questions.

For the purpose of analysis and data protection, responses were grouped into the following sector categories:

- Trade Associations
- Gas Networks
- Electricity Networks
- Investors
- Public Bodies
- Planning Consultancies
- Land Agencies
- Renewables Energy Companies
- Hydrogen Energy Companies
- Solar Energy Companies
- Gas and Renewables Energy Companies
- Solar and Battery Storage Developers

Table 1 below details the number of consultation responses by each sector category and the category proportion of the total responses.

Table 1. Consultation Responses Received by Sector Category and Category Proportion of Total Responses

Sector Categories	Number of responses	Proportion of Total Responses (%) (rounded)
Trade Associations	7	26.92%
Electricity Networks	6	23.08%
Renewables Energy Companies	2	7.69%
Gas Networks	2	7.69%
Solar Energy Companies	2	7.69%

Planning Consultancies	1	3.85%
Investors	1	3.85%
Public Bodies	1	3.85%
Land Agencies	1	3.85%
Gas and Renewables Energy Companies	1	3.85%
Hydrogen Energy Companies	1	3.85%
Solar and Battery Storage Developers	1	3.85%
Totals	26	100%

Not all respondents answered every question, with some choosing to respond only to those of specific interest to them. As a result, the number of responses varied by question. However, all responses to the public consultation have been recorded and analysed, with key themes and points presented in this document.

Analysis of Responses

Responses to the consultation were received online through Citizen Space survey and by email. Most were received by email.

Officials used the DESNZ approved AI consultation analysis tool called SIFT (Structured Information From Text) to support the review of information. This is a product created by the Data Science team in the Department for Science and Technology (DSIT). This tool is used to assist in the analysis of consultation responses submitted via email. The tool uses artificial intelligence to extract information relevant to each consultation question, transforming unstructured email responses into a format aligned with survey submissions so that all responses can be analysed together on a consistent basis. Extracted information from SIFT was then transferred to an Excel database. The database was quality assured through human reviews. This included the population of information to question responses when respondents specifically requested in their submission that analysts refer to information elsewhere in their response.

Alongside manual identification of common themes, the DESNZ approved AI tool Copilot was used to support the efficient identification of themes and key points by respondents. Officials were previously trained in its effective use and control of outputs, all of which were subject to human quality assurance.

Personal information provided in response to the consultation was handled and processed in accordance with data protection laws as per the [privacy policy](#) stated in the consultation. Furthermore, quality assurance was carried out in accordance with the [government's consultation principles](#).

Summary of Responses

This section summarises responses to each consultation question, structured in line with the chapters and sections of the consultation document. For each question, the key response themes and points raised by respondents are set out. While not every individual point raised has been reproduced in this publication, all views expressed have been considered. Therefore, a range of qualitative terms are used, such as ‘many’, ‘most’, ‘majority’, ‘some’ and ‘a few’. These terms are defined based on the percentages of the total views submitted for a response to an individual question, defined as follows:

- ‘Many’ or ‘most’ indicates 70% or higher
- ‘Majority’ indicates 50% or higher
- ‘Some’ indicates between 30% and 50%
- ‘A few’ indicates less than 30%

Most respondents directly noted which questions they were responding to. However, some submissions did not provide structured responses to the consultation questions. In addition, some respondents provided additional detailed executive summaries and references as part of their submission. To ensure additional or unstructured question response information provided was addressed and analysed, we allocated according to questions where most appropriately fit for analysis.

Similar issues were raised across multiple consultation questions. Where the same points are repeated or referred to in earlier question summaries, they are not restated in full in subsequent sections for reasons of clarity and readability.

Personal data provided as part of responses are not summarised or presented in summaries. While writing this summary, care was taken to ensure no respondent might be individually identified to guarantee confidentiality.

Proposed Fixed Fee Model

The consultation set out DESNZ’s full cost recovery approach with the proposal to introduce a fixed fee model for energy infrastructure planning applications, designed to provide a predictable and administratively efficient charging structure for planning delivery services. The proposed model would assign weightings to different planning application types based on estimated typical processing times, derived from professional judgement and internal governance processes, which are used to apportion total service delivery costs across estimated application volumes for a financial year.

DESNZ outlined the intention to implement the model from 1 August 2026, with fees subject to an annual review cycle to reflect fair and proportionate costs. Views were sought on introducing full cost recovery, introducing fees for all applications, and if fees should be based on a fixed charge.

Question 1. What is your view on DESNZ charging application fees that cover the cost of its planning delivery services in accordance with principles within HMT Managing Public Money guidance?

- a. I support this.
- b. I do not support this.
- c. Unsure.

Question 1 response options	Number of responses
I support this	18
I do not support this	3
Unsure	2
No response provided by respondent	3

Question 1 received 23 responses. 18 respondents supported the proposal for DESNZ to charge application fees that cover the cost of its planning delivery services in accordance with the principles set out in HM Treasury’s Managing Public Money guidance. 3 respondents did not support the proposal, and 2 respondents were unsure. 3 respondents did not provide a response.

Question 2. Please provide details explaining your response to Question 1.

Question 2 received 23 responses. 3 respondents did not respond.

Question 2 overview

Most of respondents supported, in principle, the proposal that DESNZ would introduce full cost recovery for its planning delivery services. Respondents acknowledged that cost recovery would support DESNZ in managing increased application volumes and resource pressures in context of Clean Power 2030, economic growth and wider government infrastructure targets. However, support was often accompanied by conditions, emphasising the need for transparency, clear justification and proportionality, alongside concerns of wider cost impacts.

Transparency and justification of fees

The majority of respondents emphasised that their support for cost recovery was conditional on fees being transparent, proportionate, and evidenced. A few respondents called for greater clarity on how fees have been calculated, including underlying cost assumptions and how these relate to the services provided. One respondent called for time-recording evidence to support the level of proposed fees.

Some respondents suggested that fees should be linked to measurable improvements in service delivery, including timing of decisions and engagement with applicants through monitored service standards.

Proportionality of the fee model

A few respondents raised concerns about the use of a flat fee model, in particular with Development Consent Orders, noting that applications vary in technology type, complexity, processing time, and resource requirements. Therefore, it would be fairer to differentiate on this basis rather than applying a single approach across all applications. Suggestions include assessing application types individually, charging in line with technology type or introducing tiered structures to better align fees with effort.

Cost burden and duplication of fees across planning regimes

Some raised concerns that the proposed fees could duplicate or overlap with existing charges payable to the Planning Inspectorate and other bodies, calling for clear alignment across regimes. Respondents highlighted the cumulative cost burden on applicants, noting that developers are subject to multiple fees across different regimes. Respondents also raised concerns that additional fees could increase administrative complexity and, in some cases, affect project viability or deter investment.

Impacts associated with Necessary Wayleaves

Some respondents raised concerns about the potential impact of increased fees for Necessary Wayleaves, including effects on land rights negotiations and compensation expectations, with potential pass-through impacts on consumers. The impact of the proposed increase to Necessary Wayleave fees is consistently raised throughout the question summaries.

Question 3. Should a fee be introduced for all application types?

- a. Yes
- b. No

Question 3 response options	Number of responses
Yes	14
No	6
No response provided by respondent	6

Question 3 received 20 responses. 14 respondents agreed that a fee should be introduced for all application types, while 6 respondents did not agree. 6 respondents did not provide a response.

Question 4. If you have responded 'No' to Question 3, which application types should be exempt and why?

Question 4 received 12 responses. 14 respondents did not respond.

Question 4 overview

Respondents' views on potential exemptions or lower fees focused on Necessary Wayleaves, Section 35 (Planning Act 2008) applications for renewable gas, Non-Material and Material Change applications, and Development Consent Orders.

Exemptions or lower fees

Responses relating to this theme include:

- Section 35 (Planning Act 2008) applications for renewable gas facilities - these should not be charged, noting that developers are required to use this route and that fees would increase costs from the outset.
- Non-material changes - these should not be subject to a fee, as they are minor in nature and require limited assessment.
- Necessary Wayleave and Tree Lopping Orders - these should be exempt or retain a lower fee, noting that these applications are required in certain circumstances to maintain electricity networks and are not made at the applicant's discretion.
- Necessary Wayleaves - these should be considered alongside the outcome of the ongoing land rights reform consultation.
- Hydrogen transport projects - consideration should be given to the interaction with the Hydrogen Transport Business Model, and that additional costs may have implications for project funding and consumers.
- Environmental Impact Assessments (EIAs) - charges may be too high for smaller Section 36 (Electricity Act 1989) variation applications where only limited issues are being considered.

Application fees across regimes for DCOs and Material Changes

A few respondents raised concerns that proposed fees for Development Consent Orders and Material Changes may duplicate fees already payable to the Planning Inspectorate. It was suggested that applicants should not be charged twice for the same processes and that any additional fees should be clearly justified and proportionate.

Question 5. Should all fees be based on a fixed charge?

- a. Yes
- b. No

Question 5 response options	Number of responses
Yes	4
No	15
No response provided by respondent	7

Question 5 received 19 responses. 4 respondents agreed that all fees should be based on a fixed charge and 15 respondents disagreed. 7 respondents did not provide a response.

Question 6. If you have responded 'No' to Question 5, what other charging models should apply and to which services?

Question 6 received 20 responses. 6 respondents did not respond.

Question 6 overview

Respondents emphasised that applications vary significantly in scale, complexity, and resource requirements, suggesting tiered, segmented, or staged fee structures as alternative approaches for cost recovery.

Tiered or segmentation of fees to reflect resource intensity and complexity

Some respondents considered that a charging model which reflects differences in complexity, information requirements, and casework would be fairer and more proportionate. Respondents noted variation in scale and complexity across application types, including Nationally Significant Infrastructure Projects and Necessary Wayleaves, and considered that a tiered or segmented approach could better align fees with the level of work required. One respondent noted that site-specific constraints, such as ecological or peat issues, can affect complexity, and one respondent suggested that metrics such as installed power capacity could be used as a proxy for complexity.

A few respondents suggested that smaller or less complex Nationally Significant Infrastructure Projects (NSIPs), such as solar or onshore wind, should attract lower DCO application fees than more complex developments. One respondent noted that a small 100MW solar project should not be subject to the same fee as a significantly larger infrastructure project. Another respondent suggested that a more proportionate fee structure could incentivise developers to submit well-structured applications.

Conditional support for a fixed-fee model

A few respondents expressed support for a fixed fee model, noting that it could provide greater certainty and predictability for applicants and offer administrative simplicity compared to more bespoke charging mechanisms. Respondents also recognised the practical challenges of implementing highly tailored fee structures. A few respondents reiterated support for a fixed fee model with the condition on fees remaining proportionate and being subject to review.

Proportionality

A few respondents noted that a fixed fee could disproportionately affect smaller projects and may create a barrier for smaller developments and low-carbon technologies, potentially pricing them out of the process. Some respondents also raised concerns about cross-subsidisation, where less complex applications may be charged at a level that does not reflect the level of assessment required.

Calculation Methodology and Proposed Approximate Fees

In this section of the consultation, the proposed approximate fixed fees calculated in accordance with HM Treasury’s Managing Public Money guidance¹ were set out in covering the estimated costs of resources required to deliver DESNZ’s planning delivery services in the 2026/27 financial year (FY). It was explained that the fixed fee model calculated individual application fees using estimated processing times for a typical application type and the estimated number of applications expected per application type in FY 2026/27. Views were sought the support for fees being based on a fixed fee model.

Question 7. Should all fees be based on a fixed fee model?

- a. Yes
- b. No

Question 7 response options	Number of responses
Yes	7
No	12
No response provided by respondent	7

Question 7 received 19 responses. 7 respondents agreed that all fees should be based on a fixed fee model, while 12 disagreed. 7 respondents did not provide a response.

Question 8. Please explain in detail your response to Question 7.

Question 8 received 22 responses. 4 respondents did not respond.

¹ [Managing public money - GOV.UK](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/672222/Managing_public_money_-_GOV.UK.pdf)

Question 8 overview

Respondents expressed mixed views on applying a fixed fee model across all application types, with concerns focused on proportionality and the need for the complexity of applications to be reflected.

Proportionality

Majority of respondents highlighted the potential for variation in Development Consent Order applications and Necessary Wayleaves, cautioning against a 'one-size-fits-all' approach. A few respondents raised concerns that a fixed fee model could be disproportionate for smaller developers or smaller-scale projects, potentially discouraging applications. A few respondents also noted the risk of cross-subsidisation, where smaller or less complex applications could contribute towards the costs of more complex cases.

Segmentation or tiered based on complexity

Some respondents suggested that fees should be segmented or tiered to reflect differences in application complexity. One respondent proposed that segmentation could be informed by factors such as sector or technology type.

Staged approach for Necessary Wayleaves

A few respondents recommended a staged fee approach for Necessary Wayleave applications, under which fees would be payable only when a given stage in the process is reached. For example, respondents suggested charging for the application stage and then charging separately for any hearing and decision stages. They noted that many Necessary Wayleave applications do not progress beyond initial submission and considered that staged charging would better reflect the work undertaken.

Discharging Requirements fee

A few respondents noted that requirements can be discharged by either DESNZ or Local Planning Authorities (LPAs) and asked how fees would apply depending on which body is acting as the discharging authority. Respondents raised concerns that a lack of clarity could result in double charging. They also requested confirmation of how any discharging fees would be applied in practice (for example, per requirement, per application, or per project), noting that a per-requirement approach could be disproportionate. One respondent suggested introducing cost bandings based on the number of requirements within a single discharge application (for example, 1–10, 10–20, 20+).

Other Fee Structure Considerations

The consultation highlighted that in developing DESNZ's preferred fee model option, a range of different models were considered. The Department recognised that the proposed fixed fee model for energy infrastructure planning applications, based on typical processing times, has some limitations, particularly in relation to very simple or very complex or resource-intensive applications, which would be charged the same typical processing time fee for their case type.

The consultation set out the intention to refine and develop the approach over time. In particular, the proposed annual review cycles would continue to consider whether emerging data could support alternative fee approaches, including segmented or tiered fees and supplementary mechanisms where applications require significantly greater resources than typical. Views were sought on these types of fee models.

Question 9. What are your views on possible future segmentation of application fees based on improved data collection?

- a. I support this.
- b. I do not support this.

Question 9 response options	Number of responses
I support this	15
I do not support this	2
No response provided by respondent	9

Question 9 received 17 responses. 15 respondents supported possible future segmentation of fees, while 2 did not support the proposal. 9 respondents did not provide a response.

Question 10. Please explain your response to Question 9.

Question 10 received 20 responses. 6 respondents did not respond.

Question 10 overview

Overall, respondents supported future fee segmentation to improve proportionality and reflect differences in application scale and complexity, whilst noting the need to balance this approach against predictability and administrative simplicity.

Segmentation of fees to reflect scale and complexity of applications

Most respondents supported segmentation of fees and underlined this approach should reflect differences in application scale and complexity. They noted that a flat fixed fee could disproportionately affect small-scale developments and potentially inhibit investment. Respondents highlighted variation in complexity within application types such as Development Consent Orders and Necessary Wayleaves and considered that a segmented model would better align fees with the workload placed on DESNZ, reducing the risk of cross-subsidisation between simpler and more complex cases.

Some respondents emphasised that any segmented approach should be supported by improved data collection, and requested clarity on the boundaries, criteria, and rationale that would underpin segmentation. One respondent suggested that, for Development Consent Order applications, installed capacity (MW) could provide a proportionate basis for tiering fees. Another respondent noted that Necessary Wayleave applications can vary significantly depending on factors such as whether infrastructure is new or existing, the type of apparatus involved, and operational voltage, and considered that a tiered fee model instead should reflect these differences.

Concerns with segmentation of fees

A few respondents raised concerns that a segmented model may be too complex to implement, emphasising the importance of predictability and administrative simplicity. While there was general support for increased proportionality, one respondent warned that a segmented approach could become ‘unwieldy’, to the detriment of overall service provision. Another respondent noted that a bespoke approach could add administrative burden and slow down the consenting process.

Staged fee model for Necessary Wayleaves

A few respondents reiterated support for a staged fee model, particularly for Necessary Wayleave applications, where fees would be payable only for the stage reached (for example, application, hearing, or decision). Respondents noted that many Necessary Wayleave applications do not progress beyond initial lodging, as they may be held in abeyance while voluntary negotiations continue. Respondents also considered that staged charging would be more proportionate, ensuring applicants are not charged for stages where DESNZ does not incur significant costs and better aligning fees with actual activity.

Question 11. If supported by data, DESNZ may consider a tiered fee model with varying fees to reflect the resource intensity of applications. What are your views on this?

- a. I support this.
- b. I do not support this.

Question 11 response options	Number of responses
I support this	17
I do not support this	3
No response provided by respondent	6

Question 11 received 20 responses. 17 respondents supported a future tiered fee model with varying fees to reflect the resource intensity of applications, while 3 did not support the proposal. 6 respondents did not provide a response.

Question 12. Please explain your response to Question 11.

Question 12 received 22 responses. 4 respondents did not respond.

Question 12 overview

Overall, most respondents supported a tiered fee model to better reflect differences in application complexity and resource demands, while a few respondents did not support tiering and emphasised the need to maintain proportionality and administrative simplicity.

Tiered fee model support to reflect scale and complexity of applications

Many respondents supported a tiered fee model, noting that it could better reflect differences in the scale, complexity, and resource intensity of applications, particularly for application types where there is significant variation, such as DCOs and Necessary Wayleaves. Respondents underlined that a fixed fee based on average cases may not adequately reflect application variation, including the actual demands placed on DESNZ. The concern of cross subsidisation was also reiterated.

One respondent suggested using installed project capacity (MW) to tier DCO application fees. Another respondent suggested applying tiering only where applications show a high degree of variation (for example, DCOs), while charging a fixed fee for application types with more limited variation. One respondent proposed applying tiering through a rebate or surcharge to an initial fixed fee, and another respondent proposed an upper cap on tiered fees to support long-term financial planning.

Evidence base for a tiered fee model

Some respondents emphasised that tiering should be based on a robust evidence base, including data on processing times, technical requirements, clear variation, and case-handling effort. They also noted that improved data collection over time could help refine and calibrate fee tiers and that fees would need to be continually reviewed.

Concerns with a tiered fee model

A few respondents raised concerns that a tiered model may become too complex, stressing the need for predictability and administrative simplicity. One respondent highlighted the risk of ‘cliff-edge’ effects, where a small change in project scope could lead to a disproportionately large increase in fees. Another respondent cautioned that tiering could become ‘unwieldy’, to the detriment of overall service provision. It was highlighted that there is a need to balance proportionality with simplicity when designing a tiered fee structure.

Other model views

A few respondents reiterated support for a staged approach for Necessary Wayleave applications, with fees payable only for the stage reached in the process. One respondent proposed an alternative charging model, either through an annual fee based on forecast running costs or a volume-based approach linked to the number of applications submitted.

Question 13. DESNZ may consider future additional hourly fees for applications that significantly exceed typical processing times.

- a. I support this.
- b. I do not support this.

Question 13 response options	Number of responses
I support this	7
I do not support this	11
No response provided by respondent	8

Question 13 received 18 responses. 7 respondents supported future additional hourly fees for applications that significantly exceed typical processing times, while 11 did not support the proposal. 8 respondents did not provide a response.

Question 14. Please explain your response to Question 13.

Question 14 received 18 responses. 8 respondents did not respond.

Question 14 overview

A majority of respondents did not support additional hourly fees, citing reduced cost certainty and predictability. Some respondents supported the use in exceptional cases, where processing times materially exceed the norm and charges are fair and clearly defined.

Cost uncertainty with additional hourly fees

A majority of respondents did not support an hourly charging model, emphasising the cost uncertainty and lack of predictability it would create for applicants. Respondents noted that hourly fees could make it more difficult for developers to plan, budget, and secure investment. One respondent considered that hourly fees would not incentivise efficiency or cost control. Another respondent did not support hourly fees on the basis that, in their view, the proposed fee levels already exceed the likely cost of the staff time required to determine applications.

Clarity on additional hourly fee thresholds

Some respondents requested further clarity on when additional hourly fees might apply, including how DESNZ would define “exceeding typical processing times”, what threshold would trigger hourly charging, and how this would be communicated to applicants.

Support for additional hourly fees

Some respondents expressed support for additional hourly fees in principle, noting that they could better reflect case-handling effort in exceptional cases where applications significantly exceed typical processing times. They also noted that a single flat fee may not fully account for such cases and considered that hourly fees could help reduce cross-subsidisation between lengthier and more straightforward applications. However, these respondents stressed that any additional hourly fees should not be punitive and should be based on factors linked to application complexity. They also noted that charging for factors outside an applicant's control would be unfair.

Question 15. Are there alternative fee models that you think DESNZ should consider in the future? Please specify.

Question 15 received 15 responses. 11 respondents did not respond.

Question 15 overview

Respondents suggested alternative fee models, such as annual, subscription-based, volume-based approaches or staged charges. As part of these suggestions some respondents took the opportunity to underline their support for tiered or segmented fee models.

Annual and volume-based models

A respondent proposed an annual fee model, under which electricity network operators would pay a share of DESNZ's forecast running costs with additional end of year charges applied where non-compliance and unreasonable conduct caused extra costs, and a proportional volume based model, under which DESNZ's total costs would be apportioned across operators according to the number of applications submitted each year.

Subscription model

A respondent presented a subscription-based model, under which DESNZ's annual costs would be shared across all service users and supplemented by lower per-application fees.

Cost-sharing model

Some respondents proposed a cost-sharing arrangement for Necessary Wayleaves, where hearing costs would be shared between network operators and landowners.

Staged or phased charging

Some respondents also expressed support for a staged or phased approach, under which fees would align to the stages reached in the application process, with lower charges for early or less complex stages.

Credits, refunds, or underspend mechanisms

One respondent suggested a mechanism to credit underspent applications. The respondent acknowledged the administrative complexity of such an approach and proposed that smoothing fees over time may offer a more practical alternative.

Phasing of fee increases pertaining to inflation adjustments

One respondent noted that application fees should either be increased in line with inflation at this stage or, if larger increases are introduced, that these should be spread over three years rather than applied as a single increase.

Proposed Annual Review Cycle and Adjustment of Fees

DESNZ outlined the proposal to undertake formal annual reviews of planning application fees to ensure fees remain fair, proportionate, and reflective of the actual costs of planning service delivery. Annual reviews would assess the accuracy of processing time assumptions, forecast application volumes, and cost allocations across planning delivery services, and would inform cost forecasts for the following financial year, taking account of customer feedback on performance and data. An inflationary adjustment would also be applied as part of each review. Fee adjustments with supporting evidence would be published on GOV.UK in advance of implementation. To support proposal development views were sought on the annual reviews, including frequency of reviews, public transparency steps and data collection.

Question 16. Costs will be reviewed annually. Do you agree with this proposal?

- a. Yes
- b. No

Question 16 response options	Number of responses
Yes	12
No	8
No response provided by respondent	6

Question 16 received 20 responses. 12 respondents agreed with the proposal for annual fee reviews, while 8 respondents disagreed with this proposal. 6 respondents did not provide a response.

Question 17. If you have responded 'No' to Question 16, how often should reviews be undertaken to support a sustainable funding model?

Question 17 received 17 responses. 9 respondents did not respond.

Question 17 overview

Respondents expressed mixed views, with a general preference for review frequencies that support predictability for applicants to support business planning.

Reduced review frequency

Many advocated for a 3 year or 3 to 5 year review cycle. They suggested this would give DESNZ more time to assess costs and gather robust data, while providing greater certainty for developers, who need advance information to support business planning. One respondent noted that DCO projects in particular have long lead times and often work to 2-3 year cycles and this should be factored into review frequency.

Nature of fee changes

A few respondents noted concerns for potential for large increases at reviews as could make it more difficult for developers to secure investment. A few respondents also emphasised that future reviews should allow fees to decrease as well as increase, as improved data becomes available. One respondent suggested that if reviews are based on reassessment of actual costs each year, an automatic inflation uplift may not be necessary.

Question 18. What other steps would you like DESNZ to consider beyond publishing fees on GOV.UK to ensure transparency and accountability?

Question 18 received 19 responses. 7 respondents did not respond.

Question 18 overview

Overall, respondents called for clear published information on how application fees are determined to support transparency and accountability and feedback mechanisms.

Transparency of fee calculation

Some respondents requested published documentation explaining how fees are determined, including information about the end-to-end activities undertaken by DESNZ when reviewing an application. A few respondents requested the publication of an annual charging report. Overall, respondents believe that publishing detailed information would help applicants understand the basis for charges and would allow them to verify that they remain proportionate and align with the Managing Public Money principles.

Feedback mechanism and stakeholder engagement

A few respondents proposed that DESNZ establish a formal feedback mechanism such as post-determination surveys or periodic consultation forms. This would allow applicants to share experiences and make suggestions. A few also requested that DESNZ engage actively with stakeholders, including early engagement and workshops, as means of improving transparency and accountability in the planning process.

Question 19. What additional data could DESNZ collect and consider to support fee modelling reviews? Please specify.

Question 19 received 13 responses. 13 respondents did not respond.

Question 19 overview

Respondents emphasised the importance of a robust evidence base to inform future fee modelling reviews, with suggestions for data gathering and the consideration of ongoing reforms.

Evidence gathering for reviews

Some respondents suggested that DESNZ gather evidence through a 12-month study across all application types, to assess the resources, tasks, and stages involved in processing applications. A few suggested using time recording data to inform this analysis and that the findings should be published. One respondent recognised that DESNZ may require a period of operating under the new fee regime to establish a baseline for subsequent charges, one respondent suggested using evidence from past projects to inform fee levels.

Feedback mechanism

A few respondents suggested establishing a feedback loop to support early and transparent communication on fee changes and to inform the annual review cycle. They also suggested allowing applicants to share their experience to support the identification of issues and improvements over time.

Land Rights reform

Some respondents emphasised that DESNZ should consider the impacts and outcomes of Land Rights reform on forecast application volumes before introducing any future fee changes. Respondents stated that reforms may remove smaller-scale projects from the Section 37 (Electricity Act 1989) consenting process, which could reduce demand on DESNZ resources and potentially lower the overall cost recovery requirement. These respondents therefore recommended waiting until the impacts of Land Rights reform are better understood before implementing fee changes.

Question 20. To help understand future application numbers in cost review cycles, do you have suggestions on how stakeholder or potential applicants can provide information on possible future application numbers and service demand?

Question 20 received 15 responses. 11 respondents did not provide a response.

Question 20 overview

Respondents suggested a mix of data-led approaches and stakeholder engagement to support forecasting of future application volumes and service demand.

Data collection suggestions

Suggestions broadly focused on four areas: national datasets, planning system data, operational or sector-specific inputs, and structured engagement mechanisms.

A few respondents suggested that DESNZ draw on existing national level data sources to support forecasting of future application volumes and service demand. This included data from the National Energy System Operator (NESO), such as the connections queue and Future Energy Scenarios, alongside the Climate Change Committee's Balanced Pathway, which a respondent noted could provide an indication of longer-term infrastructure demand.

A few respondents also highlighted the value of planning system data, including the Planning Inspectorate's register of projects and pre-application data, as a means of understanding projects at different stages of development and providing early indications of potential future workload.

A few respondents suggested that operational and sector specific inputs could support forecasting, including forecasts from individual network operators, while recognising that these are subject to external factors and dependencies. One respondent also noted that the structured six-month grid connection process for generation projects could provide insights into potential future application volumes.

A few respondents proposed the use of supplementary data sources or engagement mechanisms, including collaboration with industry trade organisations and the establishment of structured data sharing forums. Suggestions also included inputs from Regional Energy Strategic Plans, the Strategic Spatial Energy Plan, existing application or energy portal data, and light touch mechanisms such as surveys, informal reviews, or non-binding and confidential notification portals.

Challenges with forecasting future applications

A few respondents noted uncertainty relating to ongoing reforms, such as those proposed in the Consents, Land Access and Rights consultation, that may affect future application volumes and service demand. Respondents stated that these reforms could affect wayleave processes, Section 37 (Electricity Act 1989) consent requirements, and connection volumes. One respondent suggested that DESNZ could estimate how many applications may no longer require Section 37 (1989) consent following land rights reforms, based on existing application data.

A few respondents also referred to external factors that may influence forecasting, including economic conditions, Ofgem price control decisions, landowner behaviour, and the availability of development land.

Data limitations with forecasting

A few respondents expressed views on limitations in existing data and forecasting approaches. These included the impact of speculative proposals, such as those associated with grid connections, and historic spikes in application volumes. One respondent noted that data linked

to earlier milestones may be of more limited value for forecasting. However, one respondent viewed that recent connection reforms may improve forecasting accuracy over time.

Additional operational considerations

A respondent suggests that DESNZ consider having a dedicated resource or point of contact available for project teams approaching Development Consent Order implementation to discuss programme timelines and resourcing implications.

Impact Considerations

The introduction of new and updated fees, which reflect the costs of delivering energy infrastructure planning services is intended to support the long-term sustainability of the system and enable efficient decision-making in the context of increasing delivery demands. However, as part of the consultation DESNZ recognised that fee changes may have cost implications and sought stakeholder views on how the proposals might impact application behaviour, energy consumers, energy technologies or businesses and business planning to help assess potential impacts and inform the development of a fair, considered and effective fee structure.

Question 21. Will the introduction of fully cost-reflective fees affect your motivation to submit an application?

- a. Yes
- b. No

Question 21 response options	Number of responses
Yes	10
No	7
No response provided by respondent	9

Question 21 received 17 responses. 10 respondents agreed that the introduction of fully cost-reflective fees would affect their motivation to submit an application and 7 respondents disagreed. 9 respondents did not provide a response.

Question 22. Please explain your response to Question 21.

Question 22 received 19 responses. 6 respondents did not respond.

Question 22 overview

Overall, respondents’ views were mixed on whether fully cost-reflective fees would affect their motivation to submit an application, with the effect being circumstance dependent.

Unavoidable applications

A few respondents noted that, for certain application types, their motivation to submit an application is largely unaffected because there is no practical alternative to using the service. Additionally, a few respondents stated that applications for Necessary Wayleaves are often unavoidable, for example where landowners serve notices to remove.

Motivation linked to service improvements (particularly DCOs)

A few respondents indicated that their motivation to submit applications, particularly for DCO related services, would depend on the extent to which higher fees are accompanied by clear, tangible improvements in service delivery. They suggested that if fee increases are not matched by improved resourcing, faster processing, and fewer delays, higher charges may be viewed as unjustified and could deter investment and impact industry.

Cost–benefit and project risk considerations

A few respondents noted that higher fees could lead to closer scrutiny of whether and when to submit applications, particularly for projects at an earlier stage of development. One respondent highlighted that each application is a risk for the developer of a project and is a cost incurred even if projects do not proceed, meaning they would need to weigh the risk of sunk costs against the potential benefits of progressing. One respondent noted that increased costs would be considered through optioneering reviews and cost–benefit analyses for both new and replacement networks assets.

Question 23. Would you consider these proposals to disproportionately impact certain types of businesses or technologies?

- a. Yes
- b. No

Question 23 response options	Number of responses
Yes	16
No	2
No response provided by respondent	8

Question 23 received 18 responses. 16 respondents agreed that the proposals would disproportionately impact certain types of businesses or technologies, while 2 disagreed that the proposals would cause disproportionate impact. 8 respondents did not provide a response.

Question 24. Please explain your response to Question 23.

Question 24 received 18 responses. 8 respondents did not respond.

Question 24 overview

Respondents generally agreed that the proposals could disproportionately affect certain businesses and technologies, particularly smaller developers and emerging technologies.

Impact on smaller-scale developments

The majority of respondents raised concerns that the increased fees could disproportionately affect smaller-scale developers and that they could be 'priced out' of the process. They also noted that larger-scale technologies may better be able to absorb higher costs than smaller developments. To address this, some respondents recommended that costs should be proportionate to the size or scale of development. One respondent emphasised that the application fee may be a demotivating factor for smaller low carbon technology and domestic applications.

Impact on speculative proposals

A few respondents raised concerns that fee increases may disincentivise applications from technologies that rely on speculative proposals, such as battery storage projects. They noted that larger scale technologies, such as nuclear power plants and offshore wind projects, are less likely to be affected due to the scale of investment in these sectors. They therefore cautioned that higher costs could impact the future energy landscape.

Impact on customer electricity connections

Some respondents raised concerns about potential impacts on electricity connections for customers, in particular new connections. They felt that customers could be disproportionately impacted by fee increases if the costs associated with the Land Rights process rise. One respondent noted that, where Land Rights agreements are required, higher costs reflected in connection quotes could discourage domestic customers from seeking solar panel or battery connections.

Impact on electricity networks

A few Electricity Networks respondents noted that increased fees could lead landowners to terminate existing wayleave agreements in the hope of renegotiating higher compensation. They stated that this could result in network operators changing consenting strategies to reduce the risk of landowners serving notices to remove apparatus. One respondent raised concerns that this could increase legal fees costs as well as leading to longer consenting processes and delays to new connections and infrastructure.

Question 25. Do you think the introduction of new and increased fees for applicants risks the cost being passed on to domestic consumers?

a. Yes

b. No

Question 25 response options	Number of responses
Yes	15
No	1
No response provided by respondent	10

Question 25 received 16 responses. 15 respondents agreed that the introduction of new and increased fees for applicants risks the cost being passed on to domestic consumers, while 1 respondent disagreed. 10 respondents did not provide a response.

Question 26. Please explain your response to Question 25. Furthermore, if you responded 'Yes', please detail and quantify the impact to domestic consumers.

Question 26 received 16 responses. 10 respondents did not respond.

Question 26 overview

Most respondents considered that new and updated application fees risk costs being passed on to domestic consumers. However, limited quantifiable evidence was provided.

Pass-through risks to domestic consumers

Most respondents acknowledged the risk that an increase in development expenditure may be passed onto customers in the form of higher energy prices and increased connection charges. One respondent highlighted the high likelihood that organisations with domestic customers will pass on the cost of increased fees, in particular to maintain profit levels. A few respondents raised that customers will be directly charged for application costs related to new connections and Low Carbon Technology (LCT) connections. A few respondents also flagged that increased fees for Necessary Wayleaves will be recovered through the Distribution Use of System (DUoS) charging mechanism, which would result in the potential for both domestic and non-domestic consumers facing higher costs. One respondent noted that the extent to which costs will be passed onto consumers will depend on broader planning system changes and is likely to vary by technology type.

Necessary Wayleaves impacts

Some respondents warned that a fee increase for Necessary Wayleaves may lead to landowners terminating their wayleave agreements to seek 'ransom payments'. They estimated that this could significantly increase annual costs to network operators and that these costs would be passed directly to consumers. A few respondents also suggested that an increase in Necessary Wayleave costs may encourage network operators to seek permanent land rights such as easements as opposed to Necessary Wayleaves. The reliance on

easements would increase upfront costs and lengthen the consenting process, which they cautioned will ultimately lead to increased cost for consumers.

Limited risk to domestic consumers

A few respondents noted that the actual risk of costs being passed onto domestic consumers is minimal compared to cost pressure experienced in other areas such as supply chain issues, connection costs, project overruns and investment conditions. One respondent noted that there is low probability for pass through due to higher Contract for Difference (CfD) bids or CfD clearing prices for development projects.

Question 27. Do you think the introduction of new and increased fees for applicants risks the cost being passed on to non-domestic consumers?

- a. Yes
- b. No

Question 27 response options	Number of responses
Yes	15
No	1
No response provided by respondent	10

Question 27 received 16 responses. 15 respondents agreed that the introduction of new and increased fees for applicants risks the cost being passed on to non-domestic consumers, while 1 respondent disagreed. 10 respondents did not provide a response.

Question 28. Please explain your response to Question 27. Furthermore, if you responded 'Yes', please detail and quantify the impact to non-domestic consumers.

Question 28 received 17 responses. 9 respondents did not respond.

Question 28 overview

Most respondents emphasised that costs of higher application fees could be passed through to non-domestic consumers. However, quantifiable evidence was limited.

Impact on supply chain and business costs

A few respondents raised that higher upfront development, and consenting costs are highly likely to be passed on to supply chain companies and possibly to be more affected than domestic consumers. One respondent noted that increased costs may also have implications for project funding eligibility. For instance, the Hydrogen Transport Business Model defines a list of funding rules which may clash with the increased costs, and some projects may not

qualify for funding. The respondent added that this would have a knock-on effect for businesses, who may be required to absorb extra costs by passing them on to non-domestic consumers.

Pass-through costs

Some respondents highlighted that additional project development costs would inevitably affect energy prices through ‘knock on’ effects and impact all energy consumers. A few respondents raised that network operators can recover costs incurred through Distribution Use of System (DUoS) charges, meaning both domestic and non-domestic consumers would be impacted by higher costs.

Pass-through costs from networks operational and consenting changes

A few respondents raised that an increase in Necessary Wayleave cost may encourage electricity network operators to seek permanent land rights such as easements as opposed to Necessary Wayleaves, which would increase upfront costs and lengthen the consenting process, ultimately leading to increased costs for all energy consumers.

Question 29. How important is fee predictability for your organisation’s planning and budgeting?

- a. Very important
- b. Quite important
- c. Not very important
- d. Not at all important
- e. Unsure

Question 29 response options	Number of responses
Very important	19
Quite important	1
Not very important	0
Not at all important	0
Unsure	1
No response provided by respondent	5

Question 29 received 21 responses. 19 respondents answered that fee predictability is very important for their organisation’s planning and budgeting, while 1 respondent responded that it

is quite important, and 1 respondent responded that they were unsure. 5 respondents did not provide a response.

While Question 29 was a standalone multiple-choice question, some respondents provided additional details to their responses. These respondents linked fee predictability to effective forward planning and investment decision-making, including the ability to budget and allocate resources with confidence across the project lifecycle. Respondents also emphasised the importance of early notification of any future fee changes, particularly for long-lead infrastructure projects where costs may need to be forecast several years in advance. A few respondents noted that a fixed fee model could provide greater certainty for both applicants and DESNZ, however, they indicated that the importance of predictability may vary by organisation and business case, and that unforeseen new or increased fees could be more consequential where developers rely on multiple speculative applications (such as some battery storage projects) or where overall application costs are comparatively low (including smaller scale solar).

Question 30. Do you have any additional evidence or views on the potential impacts, costs and benefits of the introduction of the fixed fee model?

Question 30 received 13 responses. 13 respondents did not respond.

Question 30 overview

Most respondents provided further views on the potential implications of introducing the fixed fee model, with limited additional evidence submitted.

Fees for Necessary Wayleaves

Some respondents felt that the proposed costs for Necessary Wayleaves were high and could have negative effects on the market. They noted that the new proposed fee for Necessary Wayleaves could set a baseline compensation level for land rights negotiations, which could inflate costs for network operators and lead to these expenses being passed on to consumers. A few respondents also noted that fee increases for Necessary Wayleaves may encourage landowners to serve a notice to remove, enabling them to renegotiate using the new fee level as a baseline. One respondent suggested that costs should be shared more equitably between the terminating party (the landowner) and the applicant (the network operator), to dissuade the potential of landowners from serving notices to remove.

Phased introduction of fees

A few respondents raised concerns about introducing the higher fees in a single step. They proposed that fees should either increase over time or be set at a lower level, particularly for Necessary Wayleaves.

Justification for fee changes and fee predictability

A few respondents considered that the proposal for cost recovery would benefit from more detailed justification, given existing tax contributions and the wider public benefits of energy

infrastructure. They also noted that, without clear justification or fee predictability, budget planning and securing investment in the UK renewable market could become significantly more difficult.

Consumer costs

Many respondents highlighted concerns that costs for domestic and non-domestic consumers could increase due to the scale of the proposed new fees. This was emphasised by electricity networks and trade association respondents, one of whom estimated a significant risk of costs being passed on to electricity consumers as a result of the proposed Necessary Wayleave fee.

Statutory and Non-Statutory Decisions

Statutory timescales are currently set out for Nationally Significant Infrastructure Projects, but this is not the case for all types of energy infrastructure planning applications and associated activity. Views were sought in the consultation on the support for introducing timescales and appropriate target determination periods for application types currently without statutory timescales or deadlines.

Question 31. Would you support a future introduction of indicative or target timescales for the determination of each non-statutory application type?

- a. Yes
- b. No
- c. Unsure

Question 31 response options	Number of responses
Yes	16
No	2
Unsure	1
No response provided by respondent	7

Question 31 received 19 responses. 16 respondents agreed with the proposal for indicative or targeted timescales for the determination of each non-statutory application type, while 2 disagreed. 1 respondent was unsure. 7 respondents did not provide a response.

Question 32. Please provide reasons for your response to Question 31.

Question 32 received 20 responses. 6 respondents did not respond.

Question 32 overview

Respondents generally supported introducing clearer decision-making timescales to improve predictability and confidence in non-statutory determinations.

Certainty and stakeholder confidence

The majority of respondents supported introducing indicative timescales where these do not currently exist and highlighted the value of greater predictability and certainty in decision-making. One respondent cited variation in Section 36C (Electricity Act 1989) determination timescales as an example of how, in the absence of defined timelines, outcomes can be difficult to anticipate. Overall, respondents considered that clearer expectations on timing would reduce risk for investors, support long-term financial planning, and enable more effective project administration. A few respondents noted that, given the scale and complexity of infrastructure required to meet Clean Power 2030, the current system has limited capacity to absorb delays and that indicative timescales would help align decision making with the pace of delivery required.

Improved transparency and accountability

Some respondents highlighted that indicative timescales could improve transparency and accountability within the system. Clear timeframes were seen as a way for DESNZ to monitor performance against objectives and, where relevant, help demonstrate that fees are linked to service standards. Respondents suggested that where agreed timescales are not met there should be defined escalation routes and, in some cases, fee refunds.

Mandatory timescales

Some respondents called for mandatory, statutory decision making timescales across all chargeable DESNZ activities, suggesting that binding timelines are needed to provide guaranteed decision points and delivery commitments. One respondent proposed statutory timescales for Distribution Network Operators (DNOs) but noted that any such requirement would need to reflect the resources available to DNOs and be informed by feedback.

Question 33. If you have responded 'Yes' to Question 31, please specify views on appropriate target determination periods and whether these should vary by application type.

Question 33 received 14 responses. 12 respondents did not respond.

Question 33 overview

Respondents generally supported introducing indicative determination timescales, with an emphasis on setting expectations that are realistic across different application types.

Suggested timescales

A number of specific timeframes were suggested by respondents, including around one year for biomethane DCO decisions, up to two months for key Section 37 (Electricity Act 1989)

stages, and around three to four months from application to decision for Necessary Wayleaves. One respondent also pointed to the example of a 52-week turnaround commitment made by the Scottish Government for Section 37 and Necessary Wayleave applications for new apparatus.

Alignment with statutory timelines

Some respondents supported setting indicative or target timescales by reference to existing statutory timelines, as these are well understood and provide clear expectations. While statutory timelines were seen as a useful starting point, respondents also noted that flexibility may be needed where applications are more complex, resources are constrained, or wider reforms are underway.

Safety-critical decisions

A few respondents raised concerns about the time taken to decide safety-critical applications, particularly those relating to vegetation management around existing electricity infrastructure. They stressed that timely decisions are needed to maintain safety clearances and network reliability and suggested that these applications should be prioritised to reduce safety risks and avoid impacts on electricity supplies.

Question 34. What additional delivery metrics or service agreements should DESNZ consider in planning delivery services to ensure efficiencies and achieve value for money?

Question 34 received 17 responses. 9 respondents did not respond.

Question 34 overview

Respondents emphasised the need for clear, measurable service standards to demonstrate performance and drive continuous improvement in planning delivery services.

Service standards and performance metrics

Many respondents called for clear performance measures and greater transparency on how the planning service is operating and delivering improvements. They stressed the need for KPIs that are proportionate and measurable, and suggested metrics such as: compliance with target or statutory timeframes; the number of delays to statutory decisions; delays per application; applicant satisfaction; and visibility of case officer workload and capacity.

Energy portal

Some respondents viewed the digital case-handling portal (energy portal) as an important tool for improving transparency and oversight of the planning process. They highlighted its potential to strengthen data capture, track processing times, and identify recurring service delivery issues or bottlenecks. The respondents also suggested adding features such as live progress updates, access to project documents, and direct messaging with DESNZ case teams to help applicants understand timelines and manage expectations.

Escalation routes and refund mechanism

A few respondents suggested that clear escalation routes and consequences should be in place where service standards are not met. They noted that transparent escalation routes could help avoid prolonged delays and provide reassurance to applicants. One respondent proposed a “planning guarantee” approach, including maximum decision periods and partial fee refunds where agreed timelines are missed.

Innovation Opportunities for Service Efficiencies

The consultation outlined DESNZ’s commitment to driving innovation and improving efficiency across energy infrastructure planning delivery services, including implementing a programme of digital and process improvements to accelerate delivery, the exploration of Artificial Intelligence (AI) tools, and the introduction of an enhanced digital energy portal for energy infrastructure planning applications. These initiatives align with the wider planning reforms set out in the Planning and Infrastructure Bill. Views were sought on innovation opportunities that DESNZ should consider and whether and how organisations were intending to use tools such as AI for their planning application preparations.

Question 35. What innovative opportunities should DESNZ consider to support efficiencies within planning delivery processes?

Question 35 received 13 responses. 13 respondents did not respond.

Question 35 overview

Respondents identified a range of innovation opportunities to improve the efficiency of planning delivery, alongside expectations that any new approaches should be implemented with appropriate assurance.

Energy portal enhancements

Some respondents supported further development of the energy portal to streamline processes, improve efficiency, strengthen data capture, and facilitate information sharing. They suggested incorporating functionality to support workflow management, case tracking, and data insights to enable more timely, consistent, and transparent decisions. Other specific suggestions included enabling submission and processing of discharge requirements through the portal and incorporating a categorisation matrix to help DESNZ prioritise applications.

Use of AI

Respondents identified potential opportunities to use AI to support faster engagement and decision-making, but stressed the need for transparency, traceability, and accountability in its use. One respondent suggested AI-enabled analytics could support more accurate forecasting of application numbers. Some respondents also encouraged the use of AI where it improves data quality and online support, while emphasising that innovation should focus on process improvements and that AI should be applied only where it demonstrably adds efficiency.

Alignment with wider planning reforms

Some respondents suggested that DESNZ should focus on wider opportunities arising from reforms to the planning system, such as changes to statutory consultees and other measures to streamline the NSIP process. They considered alignment with these reforms to be an important priority for improving efficiency.

Question 36. As an organisation, do you plan to use innovative opportunities (e.g., AI) to prepare planning applications?

- a. Yes
- b. No

Question 36 response options	Number of responses
Yes	7
No	6
No response provided by respondent	13

Question 36 received 13 responses to this question. 7 respondents said that they do plan to use innovative opportunities to prepare planning applications, while 6 said that they do not. 13 respondents did not provide a response.

Question 37. Please provide details on your response to Question 36.

Question 37 received 10 responses. 16 respondents did not respond.

Question 37 overview

Respondents expressed mixed views on the use of AI in preparing planning applications, with overall emphasis on cautious use alongside appropriate professional oversight.

Value of AI

A few respondents noted that they are exploring emerging technologies and ways to integrate them into their processes. This included AI, alongside digital automation and improved data-handling systems. They indicated that current use of AI is mainly limited to tasks such as data collection and identifying relevant information, and that it may be less suitable in contexts that require engagement with landowners and local planning authorities.

Limited application of AI

Many respondents emphasised that they are taking a cautious approach to using AI and that professional judgement remains essential when preparing planning applications. One

respondent suggested that DESNZ should instead provide dedicated resource or a clear point of contact to enable a more direct, responsive approach to queries from developers.

Timing of New and Updated Fees

The consultation sought views on the proposed implementation timeline of 1 August 2026 and transition support for the new and updated fees.

Question 38. What risks (if any) do you foresee with the proposed implementation timeline of 1 August 2026 for new and updated application fees?

Question 38 received 16 responses. 10 respondents did not respond.

Question 38 overview

Respondents identified a range of risks with implementing the new and updated fees from 1 August 2026, particularly around managing the transition and providing sufficient certainty for applicants.

Short implementation timeline

Some respondents felt that the proposed timeline was too short and could create avoidable risks. They raised concerns that the transition period may not allow sufficient time for DESNZ to fully reflect consultation feedback and put robust processes in place. Some respondents also noted that developers may need to update plans, systems, and budgets at short notice, potentially creating unexpected costs. They emphasised that long lead projects, including DCO applications, require early notice and certainty over costs to support planning and investment decisions. A few also noted that expected efficiencies may not be realised for early applications, which could reduce confidence in the changes.

Impact of Necessary Wayleave fee changes

A few respondents highlighted the risk that the proposed increase in Necessary Wayleave fees could create a de facto minimum 'ransom' value in negotiations between landowners and network operators, increasing costs that may ultimately fall on consumers. They noted that higher fees could encourage landowners to serve notices to remove in pursuit of higher payments and could push operators towards more expensive and time-consuming easement agreements, potentially delaying new connections.

Alignment with wider reforms

Many respondents raised concerns that introducing the new fee regime ahead of the ongoing Electricity Network Infrastructure: Consents, Land Access and Rights reform would create risks. They noted that the reform is expected to change how applications are made, the volume of cases, and the overall cost structure. A few respondents considered that introducing new fees before these changes are finalised could result in charges that are misaligned, and

suggested aligning implementation with the completion of wider reforms to help ensure fees remain proportionate.

Other views

A few respondents also noted a risk of duplication, highlighting that some proposed DESNZ fees may overlap with charges already paid to the Planning Inspectorate or local planning authorities. One respondent requested greater clarity on fees for discharging DCO requirements, including whether charges would apply per project, per discharge application, or per individual requirement, particularly where DESNZ is not the discharging authority.

Question 39. What transitional support would be helpful for DESNZ to offer applicants ahead of the introduction of new and updated application fees?

Question 39 received 15 responses. 11 respondents did not respond.

Question 39 overview

Respondents emphasised the need for clear and timely transition support to help applicants prepare for and adjust to the new fee regime.

Engagement and detailed guidance

Majority of respondents highlighted the value of proactive engagement to support implementation of the new fee regime. Some suggested having a clear first point of contact or dedicated contacts within the department, alongside regular engagement such as workshops and Q&A sessions with industry. Detailed guidance and worked examples were also seen as important to reduce ambiguity, clarify how fees would apply in practice, and support planning of submissions, costs, and timelines. Timely and responsive support was viewed as helping applicants prepare high-quality submissions and address issues early.

Advance publication and phased implementation of fees

Some respondents highlighted the importance of publishing the final fee structure well in advance of implementation to provide certainty and support effective planning, particularly for long lead projects. Early confirmation of fees was seen as important to help applicants plan submissions, secure funding, and set project budgets. Some respondents also suggested introducing the new fees in phases to avoid sudden cost increases and give applicants more time to adjust, supporting a smoother transition for projects already underway.

Additional Guidance for Applicants

The consultation outlined existing government guidance supporting applicants submitting planning applications for energy infrastructure, including for NSIPs and electricity distribution projects. It was also recognised that DESNZ's proposal to move to a full cost recovery model for energy infrastructure planning delivery services, provides an opportunity to consider what further guidance would be helpful for applicants to submit robust applications that can be

assessed more efficiently, including reducing the need for further information requests by DESNZ. To support this initiative, views were sought from respondents on what would be helpful to include.

Question 40. What additional guidance would be helpful for DESNZ to include?

Question 40 received 13 responses. 13 respondents did not respond.

Question 40 overview

Respondents generally called for clearer, more accessible guidance to help applicants navigate requirements and submit well-prepared applications.

Updated guidance for legislative changes

Some respondents noted that guidance should be kept up to date with legislative and policy changes, including how the Planning and Infrastructure Act 2025 may affect applications. They highlighted a need for clarity on planning reforms, including how Section 37 (Electricity Act 1989) consents interact with the Planning Act 2008, exemption regulations, and permitted development rights. They also suggested that clear and up-to-date guidance would reduce uncertainty, support consistent application of the consenting framework, and improve transparency for applicants and other stakeholders.

Clarity on consenting regimes and processes

A few respondents requested clearer guidance on the statutory consent regime for overhead power lines in England and Wales under Section 37 of the Electricity Act 1989, including a review and refresh of the existing July 2014 guidance. Suggestions included clearer signposting of consenting routes (including when Section 37 consent or a Development Consent Order is required) and clearer information on eligibility, information requirements, process steps, and anticipated timescales.

A few respondents indicated that additional guidance would be helpful at specific stages of the process. This included clearer support for pre-application and acceptance stages, particularly for nascent technologies and first-of-a-kind projects. A respondent also suggested further guidance on expectations for non-statutory consultations for DCOs.

Practical and applicant-focused guidance

A few respondents suggested validation checklists, mapping tools, accessible digital portals with search functionality, and cost estimation tools for added support. One respondent noted that guidance should also support landowners and occupiers in understanding the application of fees, particularly for Necessary Wayleaves and Tree Lopping Orders under Schedule 4 of the Electricity Act 1989.

Fee supporting materials

Some respondents suggested that additional supporting materials on fees and cost structures would be helpful. This included requests for updated published fee tables, clarity of a

government-wide application fee model, and materials such as a prospectus outlining key features and costs for different applications.

Question 41. What else can be done to best support applicants in ‘getting it right first time’?

Question 41 received 16 responses. 10 respondents did not respond.

Question 41 overview

Respondents suggested a range of measures to help applicants submit complete applications first time, with an overall focus on clearer up-front expectations and more practical support throughout the application process.

Repository of planning issues and solutions

Some respondents supported the creation of a publicly accessible database, including one respondent suggesting a repository setting out planning issues encountered by applicants, alongside how those issues were resolved. A few respondents noted that this should include anonymised examples and be developed in accordance with commercial confidentiality requirements. Generally, respondents stated that worked examples would allow applicants to learn from previous cases and apply similar resolutions to their own projects.

Provision of worked examples

A few respondents emphasised the need for clear, application-specific guidance supported by worked examples of good practice. Suggestions included accessible formats such as online guidance videos, drawing on common issues identified during the review of applications.

Engagement and communication

Some respondents expressed the need for effective and early engagement to help applicants ‘get it right first time’. Suggestions included stronger pre-application engagement, clearer and more consistent scoping advice, and more consistent input from consultees. One respondent noted that requests for further information may reflect differing professional judgement or limited early consultee input, rather than poor submissions, and highlighted the need for shared responsibility across the system. One respondent also suggested clearer guidance on non-statutory consultation expectations for Development Consent Orders and a prospectus outlining key features and costs for different applications.

Utilisation of the energy portal

Some respondents supported continued use and development of the online energy portal and suggested that it should be a central location for support information to help applicants prepare submissions. Respondents welcomed further digital improvements via the portal to improve application quality, and one respondent proposed including digital cost-estimation tools.

General Feedback

In this section, respondents were invited to provide any additional views or comments that would be helpful for DESNZ to consider on the proposals of the consultation.

Question 42. Do you have any other comments regarding the proposals in this consultation that you would like DESNZ to consider?

Question 42 received 15 responses. 11 respondents did not respond.

Question 42 overview

Question 42 invited any further comments on the proposals. Whilst some respondents repeated views expressed in earlier questions, the response themes presented here reflect the views that are considered new or provide additional detail.

Renewable gas consenting route and Section 35 (Planning Act 2008)

A respondent raised concerns about the consenting framework for renewable gas infrastructure, arguing that the lack of support for renewable gas within the existing NSIP framework creates an additional barrier and that reliance on Section 35 (Planning Act 2008) orders can constrain delivery of larger scale projects. The respondent considered that introducing or increasing fees in this context could increase development risk and reduce investor appetite.

Learnings from local planning authority portal systems

A respondent suggested DESNZ review good practice in local planning authority application portal systems and approaches to managing targets.

Nascent technology projects (DCOs) and system capacity

A respondent highlighted that current limited precedent for nascent CCUS and low carbon hydrogen projects in the DCO process might result in challenges of efficient assessment. To mitigate this challenge, it was suggested to approach with flexibility, case study examples, and working with experienced organisations and industry experts. The respondent also raised wider concerns that local planning authorities, the Planning Inspectorate and regulators are under-resourced, and that this challenge may intensify as more projects become NSIPs and as the NSIP process expands to additional project types. They warned that without targeted efforts to address resourcing gaps, planning process performance standards could decline and delays could increase.

Behavioural impacts of new Necessary Wayleave fee

A respondent raised that statutory powers should be exercised as a last resort and considered that higher fees for Necessary Wayleaves could reinforce this principle and encourage earlier and more meaningful voluntary engagement between parties, potentially resulting in fewer Necessary Wayleave applications and improving settlement practices. Additionally, the

respondent noted that a higher fee would not materially change landowner behaviour, as costs and risks faced in statutory processes can already be substantial.

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