



Secretary of State for Levelling Up, Housing  
and Communities  
Rt Hon Michael Gove MP  
Dept for Levelling Up, Housing and  
Communities  
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Date:  
My Ref: G&D/DM/GJP/CLG/retrospective  
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Dear Secretary of State,

### **Support for Proposed Fee Increases on Retrospective Planning Applications**

Please accept this letter as Blackburn with Darwen Borough Council's (BwDBC) expression of strong support and encouragement for proposed Government action regarding an increase in fees for retrospective planning applications.

BwDBC previously wrote to the Secretary of State for Housing, Communities and Local Government on the 17<sup>th</sup> April 2015 and 19<sup>th</sup> February 2018, regarding the quantity of retrospective planning applications being received and the associated impact on resources and perceptions. This issue is continuing, and so the proposal to double the normal fee for this category, as set out in the Levelling Up and Regeneration Bill is fully supported and welcomed by our cross-party Planning Committee.

Whilst it's recognised that planning applications can be submitted after a development has commenced, this type of application creates additional assessment time when compared with non-retrospective applications, and often creates a negative perception of the planning system among residents.

Therefore BwDBC would like to reiterate comments previously made, in that additional fees for retrospective planning applications are believed to be justified and appropriate because it allows a proportion of the enforcement costs accrued to be

recovered when facilitating the submission of retrospective applications, as well as the determination costs.

BwDBC is very proud of the services provided by our ambitious and efficient planning team, and in the current economic climate, where planning fee income is vital to the provision of this pro-active service, the ability to capture such costs would have a positive impact, particularly on the planning enforcement service.

It is possible that higher fees for retrospective applications could deter homeowners / developers from submitting such applications. Consideration could, therefore, also be given to increasing fees for enforcement appeals to match the increased retrospective application fees, and to introducing fees for dealing with the appeal itself in addition to the retrospective application fee. This measure could further deter retrospective planning applications, thereby allowing proper assessment through the planning process.

During the next stages of the Bill, BwDBC considers that with the higher fees being introduced for retrospective planning applications, it will be necessary to clarify a definition of when the development is deemed to have commenced (for these purposes) and therefore when the higher fee for a retrospective application is required. The definition should indicate not only the works required for the development to be considered to have begun, but also whether a higher fee is required if works start after an application has been submitted, but before it is validated, registered or determined.

BwDBC therefore expresses our encouragement for this aspect of the Bill to be implemented as proposed, along with providing the helpful clarifications noted above in any associated guidance.

Yours sincerely,



Helen Holland  
Head of Growth & Development  
Blackburn with Darwen Borough Council