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30th January 2026

To, Energy Infrastructure Planning Delivery Innovation & Performance Team
Department for Energy Security and Net Zero
6th Floor
3-8 Whitehall Place
London
SW1A 2AW

Dear Energy Infrastructure Planning Delivery Innovation & Performance Team,

Thank you for the opportunity to respond to the [consultation](#) on Changes to Energy Infrastructure Planning Application Fees. We are writing to you on behalf of the Carbon Capture and Storage Association (CCSA).

The CCSA brings together a wide range of specialist companies across the spectrum of Carbon Capture, Utilisation and Storage (CCUS) technology, as well as a variety of support services to the energy sector. The CCSA exists to represent the interests of its members in accelerating the commercial deployment of CCUS in the UK, EU and internationally through advocacy and collaboration to achieve net zero emissions by 2050.

CCUS and low-carbon hydrogen (LCH) are noted by the Climate Change Committee¹ and International Panel on Climate Change as critical technologies for reaching net zero by 2050. Mitigation pathways which reach net zero greenhouse gas emissions include carbon capture and storage (CCS) as an integral part of limiting global temperature rises, alongside widespread use of LCH². Moreover, the UK Government has stated commitments to deploy CCUS and LCH in the future energy mix to deliver decarbonisation and ensure energy security. Without these critical technologies, the Government's decarbonisation ambitions will not be realised, threatening the UK's energy security and growth of low carbon industries.

¹ Climate Change Committee (2025): Seventh Carbon Budget. Advice for the UK Government. [Link](#)

² IPCC: Climate Change 2023 Synthesis Report – Summary for Policy Makers. [Link](#)



As the CCUS and LCH sectors, as well as numerous others that are essential to the future net zero UK economy will be impacted by updates to how fees are charged for energy infrastructure planning applications in **England and Wales**, we offer the following considerations for DESNZ:

1. **The CCSA flag concern of there being no linkage of improvement in performance from DESNZ. The consultation outlines that the fees proposed will cover existing DESNZ costs - and by implication not an increase in staff or similar resource.**

The CCSA is aware that local planning authority departments, the planning inspectorate and regulators are resource constrained and do not currently have the capacity to assess all consent applications in a timely manner, with CCUS particularly facing these challenges due to a large number of new infrastructure projects across different sectors moving along the consenting process. This will become an increasingly important consideration as more projects are consented as Nationally Significant Infrastructure Projects (NSIPs), and as an increasing array of project types are added to/use the NSIP process (as highlighted from the National Planning Policy Framework consultation³).

Without further focussed efforts to fix the resourcing gap, government departments, planning authorities and statutory bodies will likely find it time consuming to fully assess project applications, and performance standards will suffer. **The CCSA is, therefore, fully supportive of objectives that will assist with rapid and extensive resourcing of the departments tasked with making planning decisions.** However, we consider that this is a problem not fixed simply by the introduction of statutory charging regimes, but instead with radical thinking in relation to what it is that statutory bodies need to be assessing and considering, and how statutory bodies are able to access expertise to support them in consideration of applications. By way of example, National Highways often use contractors to respond to planning applications and some NSIPs.

We also note that given that only a handful of CCUS and LCH projects have gone through the DCO process, planning authorities and statutory consultees may experience unforeseen difficulties accurately assessing project applications. This will require flexibility in the decision-making process, and Guidance should;

- encourage that it is acceptable for public bodies to accept learnings from international examples,
- build examples from case studies,
- build on the NPS to be clear on the role of other regulatory systems in the planning process (e.g. environmental permitting and HSE) and
- support due regard being given to the views stated by industry representatives or external stakeholders who have the most knowledge of these sectors and FOAK projects.

The CCSA agree with the need to bring forward operational reforms to support streamlined consenting and recognise the challenge in meeting the Government's goal of 150 major infrastructure decisions by

³ Ministry of Housing, Communities & Local Government (2024): Proposed reforms to the National Planning Policy Framework and other changes to the planning system. [Link](#)



the end of this Parliament. **The CCSA sees merit in promoting the use of KPIs, specified timeframes for making decisions, and stretching targets to improve efficiency and efficacy in the planning system.** Timely delivery of robust consents is one of the key benefits of the Planning Act 2008 regime, and it needs to be achieved more consistently than it is at present.

The CCSA supports the position of delivering proportionate examinations for projects, enabling digital handling of data where possible to streamline the process and strengthening pre-application advice (as noted above). KPIs and targets for timescales on decisions must be deliberated carefully though, as the nuance of the specific project should not be lost in pursuit of a quicker process. Transparency in the process must be maintained (for instance where KPIs have been put in place and where timelines for decisions are stated), as confidence in the process as a whole needs to be maintained. Without this transparency and process integrity, projects may face increased delays later down the line. This transparency should also extend to any cost recovery proposals.

In order to speed up consenting, planning authorities could also take guidance or look to capacity-build their employees from organisations with prior experience or expertise that are aware of the challenges of the CCUS and LCH sectors, and the technical details involved in planning consent. Utilising industry and training providers to assist in enhancing the planning inspectorate's competency, will also be crucial. The CCSA would be happy to discuss with DESNZ and MHCLG how the delivery of this could be implemented for planning authorities or key statutory consultees, alongside others.

2. The CCSA are supportive of measures that provide transparency around how fees are calculated, to provide projects with the required certainty around future fee structures.

We note that a lack of clarity on how fees will be calculated can lead to uncertainty in calculating project costs at the time of bidding. To address this, we are minded to support fixed costs, however, flag the need for proportionality.

- Costs should be proportionate, and a one-size-fits-all solution could mean that smaller projects would be faced with disproportionate costs if they are kept in the same tier as larger projects.
- Government should also consider the impact of higher project costs which could be passed on to the customers in the form of higher energy costs which is not a desirable outcome, particularly given the current inflationary pressures impacting households.

3. The CCSA consider it essential for projects to have certainty as to when in the processes these fees will be due.

The CCSA are supportive of the development of further guidance from Government for the pre-application and acceptance **stages of the DCO process.** We note that given the nascent nature of the CCUS and LCH markets, the complexities involved, and first-of-a-kind (FOAK) nature of the proposed projects, further guidance would be beneficial to all involved parties.



We thank you for your consideration of these positions and would welcome the opportunity to discuss these with you in further detail.

Kindest Regards

A handwritten signature in black ink, appearing to read "Mark Sommerfeld", with a long, sweeping underline that extends to the right.

Mark Sommerfeld
CCSA, UK Director