

Title: The Town and Country Planning (Fees for Applications, Deemed Applications, Requests and Site Visits) (England) (Amendment) Regulations 2023 IA No: n/a RPC Reference No: n/a Lead department or agency: Department for Levelling Up Housing and Communities Other departments or agencies:	Impact Assessment (IA)
	Date: 13/07/2023
	Stage: Final
	Source of intervention: Domestic
	Type of measure: Secondary legislation
	Contact for enquiries:
Summary: Intervention and Options	RPC Opinion: n/a

Cost of Preferred (or more likely) Option (in 2019 prices, 2020 present value)			
Total Net Present Social Value	Business Net Present Value	Net cost to business per year	Business Impact Target Status
£0m	-£1,259.0m	£146.3m	Not a regulatory provision

What is the problem under consideration? Why is government action or intervention necessary?

The local authority planning application service is not consistently performing at the level it should be. One of the main causes for this is a lack of resources because planning fees do not cover the cost of the service. The planning application service costs about £675 million a year. However, income from planning fees only totals around £393 million which is financially unsustainable for local planning authorities. Local authorities have to fund the shortfall from their general budgets, leaving other areas with reduced funding. It is therefore fair and necessary for government to take action, through a national increase in planning fees and new indexation mechanism, so that users of the service bear a greater proportion of the costs and all local planning authorities benefit from increased income and greater financial sustainability to support the delivery of an effective planning service.

What are the policy objectives of the action or intervention and the intended effects?

The policy objective is to improve the speed and quality of the planning service provided by local planning authorities by generating a greater income for local authorities through an increase in fees which will enable them to secure more resources to deliver the service. It will also be fairer, as a greater proportion of the planning application service is funded, through fees, by the beneficiaries of planning gain, i.e. those using the service. The higher fees will provide local planning authorities with a higher level of income and greater financial sustainability, so that they can acquire more resources to support the delivery of an effective planning application service. The intended effect of an increase in total fee income can be measured by the local authority revenue and expenditure returns submitted by local authorities to Government¹. Key indicators of success will be an improvement in speed of decision making, measured by the proportion of applications determined within the statutory determination period, and quality of decision making measured by the proportion of decisions allowed at appeal².

What policy options have been considered, including any alternatives to regulation? Please justify preferred option (further details in Evidence Base)

If government did not increase planning fees (do nothing option), the planning service would continue to decline, as the income dropped in real terms. This would lead to planning applications taking even longer to decide, which would delay housing and other development. We have considered various levels of increase for all fees from 10% to full cost recovery. Our preferred option is to increase fees by 35% for major applications and 25% for all other applications, including householders. The preferred option strikes the right balance between providing local planning authorities with additional fee income whilst ensuring that costs are reasonable, with larger developers paying more than smaller businesses or householders. There was good support for our preferred option from respondents to our consultation³. Alongside an increase in national planning fees, DLUHC is also taking forward a programme of work to increase capability and capacity within local planning authorities. This programme of work would not be impactful without a corresponding increase in fees.

¹ <https://www.gov.uk/government/collections/local-authority-revenue-expenditure-and-financing>

² <https://www.gov.uk/government/publications/improving-planning-performance-criteria-for-designation>

³ <https://www.gov.uk/government/consultations/increasing-planning-fees-and-performance-technical-consultation>

Will the policy be reviewed? See 'Monitoring and Evaluation', page 17. If applicable, set review date: N/A				
Is this measure likely to impact on international trade and investment?			No	
Are any of these organisations in scope?	Micro Yes	Small Yes	Medium Yes	Large Yes
What is the CO ₂ equivalent change in greenhouse gas emissions? (Million tonnes CO ₂ equivalent)			Traded:	Non-traded:

I have read the Impact Assessment and I am satisfied that, given the available evidence, it represents a reasonable view of the likely costs, benefits and impact of the leading options.

Signed by the responsible:

Rachel Maclean MP
Minister of State for Housing and Planning

..... Rachel Maclean Date: 17 July 2023

Summary: Analysis & Evidence

Preferred Option

Description:

FULL ECONOMIC ASSESSMENT

Price Base Year 2019	PV Base Year 2023	Time Period Years 10	Net Benefit (Present Value (PV)) (£m)		
			Low: 0	High: 0	Best Estimate: 0

COSTS (£m)	Total Transition (Constant Price) Years	Average Annual (excl. Transition) (Constant Price)	Total Cost (Present Value)
Low	-	202.4	1685.4
High	-	227.6	1878.3
Best Estimate	-	209.3	1739.4

Description and scale of key monetised costs by 'main affected groups'

Businesses (including developers) and householders will face costs from higher application fees and in some cases from having to pay full fees for repeat applications that previously would have been free. These costs will also increase with inflation. Businesses account for the majority (c. 87-88%) of the additional costs incurred during the appraisal period

Local planning authorities will face increase costs in terms of the refunds they would be required to pay as a result of shortening the planning guarantee for non-major applications

Other key non-monetised costs by 'main affected groups'

Public bodies would also be subject to higher fees, but as this represents an in government transfer the impact has not been monetised.

BENEFITS (£m)	Total Transition (Constant Price) Years	Average Annual (excl. Transition) (Constant Price)	Total Benefit (Present Value)
Low	-	202.4	1685.4
High	-	227.6	1878.3
Best Estimate	-	209.3	1739.4

Description and scale of key monetised benefits by 'main affected groups'

Local planning authorities will benefit from increased fee revenue paid by householders and businesses. The shortening of the planning guarantee for non-major applications could result in more planning fees being refunded to householders and businesses.

Other key non-monetised benefits by 'main affected groups'

Proper funding of Local Authority planning services should enable faster processing of applications, saving applicants time and reducing uncertainty.

Key assumptions/sensitivities/risks	Discount rate	3.5
-------------------------------------	---------------	-----

There is no significant behaviour change from applicants because of the fee changes. The proper funding of planning services would result in a behaviour change from local planning authorities in terms of the speed and effectiveness of the processing of applications.

The available data sources for fees are representative.

BUSINESS ASSESSMENT (Option 1)

Direct impact on business (Equivalent Annual) £m:			Score for Business Impact Target (qualifying provisions only) £m: N/A
Costs: 167.0	Benefits: 4.8	Net: 162.2	

Evidence Base

Problem under consideration and rationale for intervention

Planning fees make an important contribution to meeting the costs of a local planning authority's planning application service but do not fully cover service costs. Any shortfall must be financed through additional paid-for discretionary services or through the local authority's budget which in turn falls on the taxpayer. Local authorities face significant budget pressures, with funding of planning services having reduced by over 54% between 2009-10 and 2017-18.

There is a general imbalance within the current planning application fee structure. Nationally, 80% of planning applications provide only 20% of the fee income. It costs a local authority over twice as much to process a householder application than the fee received (average householder application fee is £206 but the cost to the local planning authority to process that application is estimated to be £528). In the year ending June 2022, 240,594 householder applications were decided in England. This represents 58.4% of those planning applications reported by the Department, although in some local planning authorities the percentage is higher. Due to the high proportion of householder applications, this impacts on the financial sustainability of local planning authorities, particularly in councils which do not receive many larger applications, which are more likely to have fees which cover the cost of deciding the application.

There are also some application types for which no fee is currently charged, such as listed buildings consent, works on protected trees and some repeat applications, which add to the financial pressure on local planning authorities. In addition to the applications for which fees are not currently charged, there are other planning services which local planning authorities carry out without a fee. These include enforcement activity and assessing potential local plan site allocations. Providing these statutory services are a cost burden on local authorities.

According to Local Government Revenue Outturn figures for 2020-21, the current planning system costs approximately £1 billion a year, of which the planning application service costs approximately £675 million a year. Income from planning application fees is approximately £393 million a year. When including the income from other discretionary services, the overall funding shortfall for the planning applications service is approximately £225 million a year (approximately 33%).

Whilst the income from planning fees can vary for individual local planning authorities from year to year depending on the numbers and types of applications, overall underfunding leads to a consequential under-resourcing of the planning application service, which in turn leads to a reduction in overall performance levels. This holds up development, including housing supply.

The resourcing of local planning authorities is consistently raised by external stakeholders as one of the most significant barriers to development. Planning profession, local government and development industry representatives including The Royal Town Planning Institute (RTPI), Local Government Association (LGA) and the British Property Federation (BPF) are amongst many organisations calling for an increase in resources for local planning authorities.

The Government recognises that this resourcing deficit needs to be addressed so that local planning authorities have the resources they need to deliver a service that people expect as well as meeting our ambitions for planning reform. Local planning authorities need more resources, so that they can make good, timely decisions. Government also has the objective to reduce the burden on the taxpayer, so that the planning application service is principally funded by those who use it. Well-resourced local planning authorities will be able to build their capability and capacity. This will also put them in a better position to implement the reforms contained in the Levelling Up and Regeneration Bill.

The only way to increase fee income is by raising planning application fees. Planning application fees are set nationally, through secondary legislation, therefore Government intervention is required. Fees have not kept pace with inflation over the past few years. The Government last increased planning fees in 2018, with a 20% increase across all application types. This was the first increase since 2012. Inflation – as measured by the Consumer Price Index (CPI) – was 9 percentage points higher in March 2018 compared to April 2012 and so the fee increase represented an increase in real terms (ONS). However, CPI inflation was 25 percentage points higher in May 2023 than in April 2018 meaning that without these changes planning fees would have fallen in real terms by 17% since 2012. The proposals below would represent a real increase in the fees for major application but would restore fees to their 2018 levels for other application types (ONS).

We consulted on our proposals to increase planning application fees, and related measures, for 8 weeks, from 28 February 2023, in our *Technical consultation: Stronger performance of local planning authorities supported through an increase in planning fees*. We proposed that fees for major applications should be increased by 35% and all other fees by 25%. We also proposed that fees should be subject to an automatic, annual increase in line with inflation. We had 495 responses to our consultation, from a wide range of respondents. The responses were generally supportive of our proposals. The government response to the consultation will be published here - <https://www.gov.uk/government/consultations/increasing-planning-fees-and-performance-technical-consultation>.

Rationale and evidence to justify the level of analysis used in the IA (proportionality approach)

The proposals were anticipated to have significant impact and therefore a detailed cost-benefit analysis approach is justified. To ensure analysis is proportionate, only the impacts from measures reasonably expected to have a significant economic impact on householders and businesses were monetised.

Description of options considered

We have considered four options for planning fees:

1. Option 1 - Do Nothing
2. Option 2 - Increase planning fees by 35% for major applications and 25% for all other applications (consultation option)
3. Option 3 - Do not proceed with a fee increase for householders or proceed with a smaller fee increase for householders, such as 10%, 15% or 20%, but maintain 35% for major applications and 25% for all other applications
4. Option 4 - Full cost recovery

Option 1 – Do nothing

Under this option there is no change to planning fees.

Fees for submitting planning applications generally represent a fraction of overall application costs¹ (including scheme development and application preparation), and an even smaller share of overall development costs. If other development costs continue to increase but application costs remained constant, the proportion of development costs that planning applications account for will be declining.

There is currently a shortfall of £225m between the income from planning fees and the cost to local authorities of processing these applications. If we do nothing, this shortfall will increase, as

¹ Costs from a 2009 benchmarking exercise by Arup: <https://www.thenbs.com/PublicationIndex/documents/details?Pub=DCLG&DocID=290411>

the gap between the fee income, which remains the same, and increasing costs of providing the service increases. This will continue year on year, with the fee income progressively losing value. The growing shortfall will put additional and increasing pressures on local authority budgets.

To do nothing would result in a continued decline in local authority performance in relation to planning, as the income continues to drop in real terms, year on year, with a consequential increasing adverse impact on delivery of new development.

Option 2 - Increase planning fees by 35% for major applications and 25% for all other applications (preferred)

This is the preferred option, and the option which was consulted on in the technical consultation '*Stronger performance of local planning authorities supported through an increase in planning fees*' (from 28 February to 25 April 2023). This option will increase planning fees for major applications by 35%, with all other applications increasing by 25%. There was strong support for this option among respondents to the consultation.

The proposed increase in planning fees would apply to all applicants, unless other existing exemptions apply. The proposed fee increase represents a proportionate approach that provides additional income for local planning authorities, whilst not unfairly introducing disproportionately high fee increases for householders and small businesses who may be more sensitive to charges than other groups. However, we estimate that generally fees for planning applications are currently estimated to represent a small proportion, less than 1%, of overall development costs; under this option, the proportion of development costs that planning fees account for is expected to increase compared to the counterfactual, but to remain less than 1% of overall development costs.

Any remaining shortfall between fee income and the cost of the service will, in effect, continue to be subsidised by the general taxpayer.

Option 3 – No or smaller increase for householders but maintain 35% for major applications and 25% for all other applications (i.e. Option 1 with no or a smaller increase for householder fees)

Option 3 will increase fees for major applications by 35%, householder fees by up to 20%, and 25% for all other applications. This would provide an increased income while reducing the impact on householders who choose to submit a planning application. However, it would reduce the income for local planning authorities and would perpetuate the existing imbalance within the fee structure whereby 20% of fee income is attributable to 80% of planning applications. This would be particularly significant for those local planning authorities who have a high proportion of householder applications, which cost more than double to process than the fee charged.

Under this option, it is likely that there will continue to be a significant gap between the fee and cost of processing householder applications. Any shortfall in funding would have to be met through the wider council budget which could impact on the delivery of other council services.

Option 4 - Full cost recovery

Option 4 would see the planning application service being fully self-funding. Increasing all fees to the level of full cost recovery would put local planning authorities on a more secure, sustainable financial footing. This would mean substantial increases for most non-major applications, including householder fees, which would increase by 155% from £210 to £530.

To increase fees to full cost recovery levels would mean disproportionate and substantial increases to many minor applications compared to the counterfactual. Householders and small businesses, who are currently more sensitive to charges than other groups due to the recent cost of living increases, are likely to be significantly impacted.

Further supplementary measures

These measures would be introduced alongside an Option above.

Measure A - an annual inflation-related adjustment of planning fees

This measure will ensure that the fee level does not fall behind inflation by annually adjusting all planning fees in line with inflation. The proposed indexation mechanism will be calculated on the basis of the 12-month Consumer Price Index (CPI) rate, which is currently used to increase fees in the Nationally Significant Infrastructure Planning regime. The September CPI would be used to increase the current fees, from the 1 April in the following year. This annual uplift would help ensure that fees do not lose their real value.

In the first year, fees would not be updated, and so this would start from the 1st of April 2025.

This will help local planning authorities better manage their costs and will ensure that an established fee level is maintained, which will help local authorities to manage their budgets and to maintain their performance. There was strong support for this measure among respondents to the consultation.

Measure B - remove 'free-go' for repeat applications

This measure will remove the 'free-go' for repeat applications.

In many circumstances, an applicant can reapply for planning permission (whether it has been granted or refused) for the same site, within 12 months, and not have to pay a further fee. Although this is useful in improving an application which would otherwise have been refused, it can be used as a substitute for pre-application discussions or to attempt to test a lower quality or larger development. In these cases, local authorities have to consider two applications but only receive a fee for one. This is a growing cost burden for local planning authorities who still incur costs for processing revised applications but receive no fee.

In order to encourage applicants to engage in pre-application discussions and support the submission of high-quality applications first time round, we are removing the 'free go' for repeat applications. Removal of the 'free-go' for repeat applications will provide local planning authorities with additional fee income, reflecting the cost to local planning authorities of processing these applications.

Measure C - introduce a prior approval fee for the permitted development right allowing the Crown to develop sites within the perimeter of a closed defence site

In December 2021 the Government introduced a new permitted development right allowing development by the Crown on a closed defence site under Class TA of Part 19 of the Town and Country Planning (General Permitted Development) (England) Order 2015, as amended. The right allows the Ministry of Defence (MOD) to both extend and alter existing buildings and erect new buildings within the perimeter of a site, subject to certain limitations and conditions.

There are two circumstances under which the applicant must apply to the local planning authority as to whether prior approval is required. There may be cases where both circumstances apply. We consider that a single fee of £120 (inclusive of the proposed fee increase) should be introduced where any of the circumstances apply. This fee reflects that a cost will be incurred by local planning authorities to determine a prior approval application and is consistent with other prior approval application fees where a similarly limited number of additional matters are required to be considered.

Measure D - reduce the Planning Guarantee from 26 weeks to 16 weeks for non-major applications

The Planning Guarantee allows for an applicant to secure a refund of the planning fee where a planning decision has not been made within 26 weeks of submitting a valid application if an extension of time has not been agreed with an applicant. This is a much longer period than the statutory determination periods, which are 8 weeks, 13 weeks or 16 weeks, depending on the application type. We are more closely aligning the Planning Guarantee with the statutory time period by reducing it to 16 weeks for applications which have an 8 week statutory determination period. (The Planning Guarantee will remain at 26 weeks for applications with statutory determination periods of 13 weeks or 16 weeks.)

We recognise that there are applications where there are good reasons why an extension to the statutory determination period may be required. As such we would retain existing exemptions from the Planning Guarantee. However, the reduction of the Planning Guarantee to 16 weeks for non-major applications should result in local planning authorities deciding non-major applications more quickly. This will help speed up delivery of development.

Policy objective

The policy objective is to improve the speed and quality of the planning service provided by local planning authorities by generating a greater income for local authorities through an increase in fees which will enable them to secure more resources to deliver the service. This will alleviate delays and barriers to development. With the increased fees covering a larger proportion of the costs of processing planning applications local planning authorities will have a more sustainable income.

The impact of the policy will be seen in the increased revenue generated from planning fees by local authorities. This is submitted in annual returns to government and collated in a table (RO5)².

We monitor the performance of local authorities in terms of speed and quality of decision-making. We would expect to see an improvement in these measures of performance³.

Summary and preferred option with description of implementation plan

The preferred option (Option 2) will be implemented through secondary legislation. We expect the secondary legislation to be introduced in summer 2023, and for the fee increase to be implemented in October 2023, subject to Parliamentary approval. As affirmative regulations, the regulations will be laid in draft and debated in both Houses of Parliament before they come into force. The regulations do not require applicants to change their processes: the only change for applicants is the cost of the fee.

² <https://www.gov.uk/government/collections/local-authority-revenue-expenditure-and-financing#2023-to-2024>

³ <https://www.gov.uk/government/publications/improving-planning-performance-criteria-for-designation>

Monetised and non-monetised costs and benefits of each option (including administrative burden)

The analysis assumes that the changes in fees will have not change developer behaviour in terms of the number of applications submitted. Under all options, future application numbers are estimated for the following three scenarios:

- i. Low: The increase in householder applications observed since the Covid-19 pandemic is assumed to be temporary and householder applications return to the pre-pandemic average and are static. All other application types change by the same proportion year-on-year as forecast private enterprise starts. This approach uses the latest OBR forecasts of private enterprise starts (March 2023). The OBR forecasts only reach 2027/28; application numbers beyond 2027/28 are assumed to be static.
- ii. Central: As above, but beyond 2027/28 most planning applications types are assumed to increase by 1.5% year on year (this is based on an extrapolation of the OBR net additions forecasts). Householder applications are assumed to be static and the average of the last 4 financial years.
- iii. High: As above, but beyond 2027/28 most planning application types are assumed to increase by 4.5% to 7% per year. This percentage increase is derived from the rate at which net additions must grow linearly to meet the target of delivering 300k homes by the end of the appraisal period. The increase is householder applications observed since the Covid-19 pandemic is assumed to be permanent and householder applications remain static at the average of the last 2 financial years.

Many application types have variable fees and so real-world data is needed to find the average. Average fees data were sourced from the Planning Advisory Service's (PAS) project data for 5 local planning authorities in the same geographic area between 2015-16 and 2018-19; this is the Sheffield City Region data. The data is considered reliable as it includes data post the latest fees update in 2018 and the area was chosen by PAS due to providing a representative mix of applications from England as a whole. To match fee data, application numbers are broken down according to the categories used in the Sheffield City Region data (see **Annex 1**). Where available, published data on District Planning Application Statistics⁴ is used. The data covers Q2 1979 through Q3 2022 for most main application types. Where this data does not cover an application type we use internal DLUHC data comparing 2022 application numbers to 2021. The costs and benefits are modelled by multiplying the expected numbers of applications by type and sub-category (repeat) by an estimate of the average fee by application type derived from the Sheffield City Region data.

To estimate costs from the policy options, we assumed a start date for the policy of Q3 2023, and evaluated the policy up until Q3 2033. All costs were discounted with a discount rate of 3.5% and were adjusted to 2019 £s using the OBR's estimate of the GDP deflator. This is in line with guidance from the Treasury Green Book. The monetised impacts of each option relative to the counterfactual are presented below, with further tables summarising the impacts by year presented in **Annex 2**.

Option 2: Increase planning fees by 35% for major applications and 25% for all other applications

This option will result in the following impacts:

- A **transfer** from business and householders to local planning authorities via increased fee revenue of between £63.3m and £70.6m (central: £65.3m) per year.
- **Unquantified benefits** to business and householders from an improved planning service.

⁴ <https://www.gov.uk/government/statistical-data-sets/live-tables-on-planning-application-statistics>

Option 2	Average annual impact Q4 2023 to Q3 2033 (£m, £ 2019)			Total impact Q4 2023 to Q3 2033 (£m, £ 2019, 2023 PV)			NPSV
	Low	Central	High	Low	Central	High	
Benefit to Local Planning Authorities	63.3	65.3	70.6	531.3	546.6	587.1	0
Cost to businesses	55.7	57.2	62.1	467.5	478.9	515.4	0
Cost to householders	7.6	8.0	8.5	63.8	67.7	71.7	0

Option 3: No or smaller increase for householders but maintain 35% for major applications and 25% for all other applications (i.e. Option 1 with no or a smaller increase for householder fees)

Based on an assumed increase in householder fees of 0%, this option will result in the following impacts:

- A **transfer** from business and householders to local planning authorities via increased fee revenue of between £55.7m and £62.1m (central: £57.2m) per year.
- **Unquantified benefits** to business and householders from an improved planning service.

Based on an assumed increase in householder fees of 20%, this option will result in the following impacts:

- A **transfer** from business and householders to local planning authorities via increased fee revenue of between £61.8m and £68.9m (central: £63.7 m) per year.
- **Unquantified benefits** to business and householders from an improved planning service.

Option 3	Average annual impact Q4 2023 to Q3 2033 (£m, £ 2019)			Total impact Q4 2023 to Q3 2033 (£m, £ 2019, 2023 PV)			NPSV
	Low	Central	High	Low	Central	High	
Benefit to Local Planning Authorities	55.7 – 61.8	57.2 – 63.7	62.1 – 68.9	467.5 – 518.5	478.9 – 533.1	515.4 – 572.8	0
Cost to businesses	55.7	57.2	62.1	467.5	478.9	515.4	0
Cost to householders	0 – 6.1	0 – 6.4	0 – 6.8	0 - 51.0	0 - 54.2	0 - 57.3	0

Option 4: Full cost recovery

This option will result in the following impacts:

- A **transfer** from business and householders to local planning authorities via increased fee revenue of between £69.7m and £79.2m (central: £74.0m) per year.
- **Unquantified benefits** to business and householders from an improved planning service.

To note, that local authority data (RO5 tables) show that there's a shortfall of £225 million per year between the cost of the planning service and fee income. It would be expected that this option would recover the shortfall and therefore should be expected to result in an annual transfer of a similar

magnitude. The estimates from this analysis do not suggest that such a large amount would be recovered. This is likely explained by the small sample of authorities in the source data; those authorities included in the Sheffield City Region may not have a shortfall that is representative of the rest of the country and potentially due to lower than average costs. These estimates therefore likely understate the true impact of the proposals on stakeholders.

Option 4	Average annual impact Q4 2023 to Q3 2033 (£m, £ 2019)			Total impact Q4 2023 to Q3 2033 (£m, £ 2019, 2023 PV)			NPSV
	Low	Central	High	Low	Central	High	
Benefit to Local Planning Authorities	69.7	74.0	79.2	576.6	612.4	655.0	0
Cost to businesses	6.6	7.0	8.4	48.6	51.8	48.6	0
Cost to householders	63.1	67.0	70.8	527.9	560.5	593.1	0

Measure A - an annual inflation-related adjustment of planning fees

The option would be taken forward with Option 2 or Option 3 (this measure would not be necessary if Option 4 was pursued). This option has been modelled using OBR forecasts of CPI inflation.

If in combination with Option 2, this option will result in the following impacts:

- A **transfer** from business and householders to local planning authorities via increased fee revenue of between £163.0m and £183.5m (central: £168.6m) per year.
- **Unquantified benefits** to business and householders from an improved planning service.

If in combination with Option 3 with an increase in householder fees of 0%, this option will result in the following impacts:

- A **transfer** from business to local planning authorities via increased fee revenue of between £152.7m and £171.9m (central: £157.7m) per year.
- **Unquantified benefits** to business and householders from an improved planning service.

If in combination with Option 3 with an increase in householder fees of 20%, this option will result in the following impacts:

- A **transfer** from business and householders to local planning authorities via increased fee revenue of between £161.0m and £181.2m (central: £166.4m) per year.
- **Unquantified benefits** to business and householders from an improved planning service.

Measure A	Average annual impact Q4 2023 to Q3 2033 (£m, £ 2019)			Total impact Q4 2023 to Q3 2033 (£m, £ 2019, 2023 PV)			NPSV
	Low	Central	High	Low	Central	High	
<i>In combination with Option 2</i>							
Benefit to Local Planning Authorities	163.0	168.6	183.5	1,355.9	1,399.0	1,512.4	0
Cost to businesses	141.9	146.1	159.7	1,179.4	1,211.6	1,314.1	0

Cost to householders	21.2	22.5	23.8	176.5	187.4	198.3	0
<i>In combination with Option 3</i>							
Benefit to Local Planning Authorities	152.7 – 161.0	157.7 – 166.4	171.9 – 181.2	1,269.6	1,307.3	1,415.4	0
Cost to businesses	141.9	146.1	159.7	1,179.4	1,211.6	1,314.1	0
Cost to householders	10.9 – 19.1	11.5 – 20.3	12.2 – 21.5	90.2 – 159.2	95.7 – 169.1	101.3 – 178.9	0

Measure B – remove ‘free-go’ for repeat applications

The number of free-to-go repeat applications is estimated from the number of applications in the Sheffield City Region dataset where no fee is paid and the application type allows for free-to-go repeats. It is assumed that this applies to major, minor, householder, change of use, and advert applications. However, applications might incur no fee for other reasons (e.g. disabled access for householder applications), and so this is likely to be an overestimate of the number of free-to-go repeat applications that would be avoided under this measure.

The option would be taken forward with Option 2 or Option 3 (this measure would not be necessary if Option 4 was pursued).

If in combination with Option 2, this option will result in the following impacts:

- A **transfer** from business and householders to local planning authorities via increased fee revenue of between £87.6m and £97.7m (central: £90.4m) per year.
- **Unquantified benefits** to business and householders from an improved planning service.

If in combination with Option 3 with an increase in householder fees of 0%, this option will result in the following impacts:

- A **transfer** from business to local planning authorities via increased fee revenue of between £79.0m and £88.0m (central: £81.3m) per year.
- **Unquantified benefits** to business and householders from an improved planning service.

If in combination with Option 3 with an increase in householder fees of 20%, this option will result in the following impacts:

- A **transfer** from business and householders to local planning authorities via increased fee revenue of between £85.9m and £95.7m (central: £88.6m) per year.
- **Unquantified benefits** to business and householders from an improved planning service.

Measure B	Average annual impact Q4 2023 to Q3 2033 (£m, £ 2019)			Total impact Q4 2023 to Q3 2033 (£m, £ 2019, 2023 PV)			NPSV
	Low	Central	High	Low	Central	High	
<i>In combination with Option 2</i>							
Benefit to Local Planning Authorities	87.6	90.4	97.7	735.4	757.3	813.0	0

Cost to businesses	75.0	77.1	83.6	629.7	645.1	694.3	0
Cost to householders	12.5	13.3	14.1	105.7	112.2	118.7	0
<i>In combination with Option 3</i>							
Benefit to Local Planning Authorities	79.0 - 85.9	81.3 - 88.6	88.0 - 95.7	633.2 - 720.9	680.6 - 741.9	731.9 - 796.8	0
Cost to businesses	75.0	77.1	83.6	629.7	645.1	694.3	0
Cost to householders	4.0 – 10.8	4.2 - 11.5	4.5 - 12.2	33.5 - 91.2	35.6 – 96.9	37.6 - 102.5	0

Measure C – introduce a prior approval fee for the permitted development right allowing the Crown to develop sites within the perimeter of a closed defence site

This measure has no business impact and represents a within government transfer. As such it has not been monetised.

Measure D – reduce the Planning Guarantee from 26 weeks to 16 weeks for non-major applications

An illustrative estimate of the additional costs of reducing the planning guarantee for non-Major application has been calculated using published data on planning applications decided and granted between July and September 2022. This data shows the additional percentage of cases that would be caught under the shortened planning guarantee but does not track where applications have had their deadlines extended by mutual agreement. According to policy specialists, a large proportion of those applications that currently run over do have their deadlines extended by mutual agreement. As such, the estimate using only the additional percentage of overruns can only be treated as illustrative of the maximum potential impact. To ensure this is the case, the impact is only estimated with the other supplementary measures for Options 2, 3 and 4. For Option 1 (Do Nothing) the impact can be estimated in isolation of the other measures.

The option would be taken forward with Option 1, Option 2, Option 3, or Option 4. The policy will result in the following impacts:

- **A transfer** between local planning authorities to business and householders:
 - o If in combination with Option 1, a net transfer of between £6.3m and £7.0m (central: £6.5m) per year from local planning authorities to householders and business.
 - o If in combination with Option 2 with all other supplementary measures (Preferred Option), a net transfer of between £189.8m and £213.5m (central: £196.3m) per year from business and householders to local planning authorities.
 - o If in combination with Option 3 with all other supplementary measures, a net transfer of between £187.4m and £210.9m (central: £193.8m) per from businesses and householders to local planning authorities and businesses and householders.
 - o If in combination with Option 4, a net transfer of between £58.3m and £66.5m (central: £62.2m) from businesses and householders to local planning authorities.
- **Unquantified benefits** to business and householders from an improved planning service.

Measure D	Average annual impact Q4 2023 to Q3 2033 (£m, £ 2019)			Total impact Q4 2023 to Q3 2033 (£m, £ 2019, 2023 PV)			NPSV
	Low	Central	High	Low	Central	High	
<i>In combination with Option 1</i>							
Net impact on Local Planning Authorities	- 6.3	- 6.5	- 7.0	-53.0	-54.8	-58.7	0
Net impact on businesses	4.8	4.9	5.3	40.2	41.1	44.3	0
Net impact on householders	1.5	1.6	1.7	12.8	13.6	14.4	0
<i>In combination with Option 2, and Measures A and B</i>							
Net impact on Local Planning Authorities	189.8	196.3	213.5	1579.4	1629.9	1760.9	0
Net impact on businesses	-166.6	-171.6	-187.6	-1386.4	-1423.4	-1543.2	0
Net impact on householders	-23.1	-24.7	-26.0	-193.0	-206.4	-217.7	0
<i>In combination with Option 3, and Measures A and B</i>							
Net impact on Local Planning Authorities	187.4	193.8	210.9	1559.9	1609.1	1738.9	0
Net impact on businesses	-166.6	-171.6	-187.5	-1386.4	-1423.4	-1543.2	0
Net impact on householders	-20.8	-22.2	-23.4	-173.5	-185.7	-195.7	0
<i>In combination with Option 4</i>							
Net impact on Local Planning Authorities	58.3	62.2	66.5	481.6	513.5	549.1	0
Net impact on businesses	0.0	-0.2	-0.9	6.9	5.2	-0.3	0
Net impact on householders	-58.4	-62.0	-65.6	-488.5	-518.7	-548.8	0

OTHER COMBINATIONS OF OPTIONS

Option 2 with Measure A and B

This option will result in the following impacts:

- A **transfer** from business and householders to local planning authorities via increased fee revenue of between £196.1m and £220.5m (central: £202.8m) per year.
- **Unquantified benefits** to business and householders from an improved planning service.

Option 2 + A + B	Average annual impact Q4 2023 to Q3 2033 (£m, £ 2019)			Total impact Q4 2023 to Q3 2033 (£m, £ 2019, 2023 PV)			NPSV
	Low	Central	High	Low	Central	High	
Benefit to Local Planning Authorities	196.1	202.8	220.5	1632.4	1684.6	1819.6	0
Cost to businesses	168.2	189.2	173.2	1399.3	1437.1	1557.6	0
Cost to householders	27.9	29.6	31.4	233.2	247.6	262.0	0

Option 3 with Measure A and B

If householder fees increase by 0%, this option will result in the following impacts:

- A **transfer** from business to local planning authorities via increased fee revenue of between £190.5m and £207.4m (central: £184.4m) per year.
- **Unquantified benefits** to business and householders from an improved planning service.

If householder fees increase by 20%, this option will result in the following impacts:

- A **transfer** from business and householders to local planning authorities via increased fee revenue of between £193.7m and £217.9m (central: £200.3m) per year.
- **Unquantified benefits** to business and householders from an improved planning service.

Option 3 + A + B	Average annual impact Q4 2023 to Q3 2033 (£m, £ 2019)			Total impact Q4 2023 to Q3 2033 (£m, £ 2019, 2023 PV)			NPSV
	Low	Central	High	Low	Central	High	
Benefit to Local Planning Authorities	190.5 – 193.7	184.4 – 200.3	207.4 – 217.9	1,534.8 - 1,612.9	1,580.9 – 1,663.9	1709.8 - 1,797.6	0
Cost to businesses	168.2	173.2	189.2	1,399.3	1,473.1	1,557.6	0
Cost to householders	16.3 - 25.6	17.3 - 27.2	18.3 - 28.7	135.5 – 213.6	143.9 - 226.8	152.2 - 240.0	0

Direct costs and benefits to business calculations

The direct costs to business from increased applications fees can be found in the tables above. The estimated costs to business by year (between Q4 2023 and Q3 2033) can be found in Annex 2.

There are no direct benefits to business from these changes.

Risks and assumptions

The model assumptions, with justifications and risks are as follows:

1. There is no behavioural change from raising fees.

- a. We believe this is reasonable given the small cost of fees relative to construction in most cases.
 - b. Any resulting reduction in applications is likely to be small compared to the reductions modelled in the alternative applications scenarios.
2. The average fees paid by application type in Sheffield City Region in 2018-19 are representative.
 - a. This is likely the case for most fees, but there is a small sample size and large variance for some categories, notably 'major major' applications.
 - b. The inconsistency between model outputs and other sources of data on the shortfall between planning fees income and the costs of the planning service (from RO5 tables) suggest that the data from Sheffield is not representative – the fees charged could be more than the national average and/or costs incurred could be less than the national average – which could mean that the estimated impacts for all options are understated.
3. Application numbers will follow changes in building starts, with uncertainty about numbers beyond 2027/28.
 - a. We estimate three scenarios to mitigate the uncertainty in future applications numbers.
 - b. The low scenario assumes that future application numbers will increase at the same rate as building starts, in line with OBR projections until 2027/28. Beyond 2027/28, application numbers are assumed to be constant. Householder applications are assumed to return to the pre-Covid-19 average (i.e. the increase after the outbreak of the pandemic was temporary) and are static.
 - c. Changes in application numbers in the central scenario is the same as the low scenario until 2027/28, beyond which application numbers are assumed to increase by 1.5% per year to continue the underlying long-term trend. Householder applications are assumed to be static and the average of the last 4 financial years available (spanning pre- and post- Covid-19 pandemic).
 - d. Changes in application numbers in the high scenario are assumed to be the same as previous scenarios until 2027/28. Beyond 2027/28, application numbers are assumed to increase at the same rate as would be required for net additions to linearly increase to meet the 300k per year target by the end of the appraisal period. Householder applications are assumed to remain at the post-Covid-19 average (i.e. the increase after the outbreak of the pandemic was permanent) and are static.
4. The share of 0-fee applications in Sheffield City Region is assumed to capture the share of 'free-to-go' repeat applications more broadly for the relevant application types.
 - a. It is likely that this overestimates the share of 'free-to-go' repeat applications in Sheffield City Region (as there may be other reasons an application pays no fee), but it is impossible to say how representative this is at the national level.
 - b. To expand the sample for 0-fee applications, we include applications from all years captured by the Sheffield City Region project (2015-16 to 2018-19). This is found to only make a relatively small difference in the estimated share of 0-fee applications.
5. Under measure A, fees are assumed to increase in line with CPI inflation as forecast by the OBR (March 2023).

The main risks to the model are in assumptions 2 and 4 above: that data from Sheffield City Region is a good representation of fees and repeat application rates more broadly (this is also

used for the 'hours taken' estimates for the full recovery option). The table below shows sample sizes, average fees and hours along with variance in fees:

	Count with fee	Average fee (£)	Std Dev (£)	Average hours
Majormajor	91	21,729.4	26,058.1	145.1
Minormajor	235	8,271.3	10,689.7	89.8
Minor	1,627	753.4	966.0	15.4
Householder	2,810	208.2	23.9	9.0
Advert	334	217.8	144.3	5.0
Change of Use	399	528.4	850.8	10.0
Certificate	122	196.2	146.8	5.0
Condition	810	113.0	20.3	1.2
Non-material Amendment	182	160.4	96.7	2.0
Prior	115	170.8	122.6	7.0

Impact on small and micro businesses

Increasing fees will have an impact on those small and micro businesses who submit planning applications by increasing their costs when they make a planning application which requires a fee. However as the largest increase (under options 2 and 3) is on applications for major developments, small and micro businesses are likely to gain relative to larger competitors. Small and micro businesses will benefit proportionately more than larger businesses from a better resourced planning system, which is able to deliver good quality planning decisions more quickly, so that their more limited resources are not tied-up for so long. Note that the Levelling Up and Regeneration Bill Impact Assessment estimated that small and micro developers accounted for only between 9% and 10% of market share⁵.

Wider impacts (consider the impacts of your proposals)

The wider impacts of this policy will be seen in a better resourced and better performing planning application service, which will be able to deliver better quality decisions more quickly. This will help the delivery of housing and allow businesses to adapt and develop more quickly

A summary of the potential trade implications of measure

There are no trade implications.

Monitoring and Evaluation

If the policy is successful, local authorities will receive more income from planning application fees and invest this into their planning application service. We can monitor this through the collated annual returns to government which are published in a table (RO5), which should show an increase in income and spend on development management (planning application service). However, if the number of applications reduces significantly as a result of general housing market conditions, the impact of the policy in terms of increased income may be diminished. Similarly, if the proportion of application types changes, there will be a consequential impact on the income raised. This could be higher than expected if the proportion of major applications increases, or lower if the proportion of major applications decreases.

⁵ <https://publications.parliament.uk/pa/bills/cbill/58-03/0169/LevellingUpandRegenerationBillImpactAssessment.pdf> page 88-89

As a consequence of increased income, we expect that, with the additional resources, the performance of local authorities in terms of speed and quality of decision-making will improve. These are monitored through arrangements introduced by the Growth and Infrastructure Act 2013. Under-performing local planning authorities may be designated⁶, if they fail to meet published speed and quality criteria. In the longer-term, we intend to revise and extend the range of performance metrics, within a broadened planning performance framework, to improve the overall quality of the service being provided .

We intend to review planning fees in 2026, by which time the benefits of the fees increase and other measures covered in this Impact Assessment should be realised, the reforms within the Levelling Up and Regeneration Bill will have been implemented and there should be efficiencies from increased digitalisation across the local authority planning sector.

6

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1112048/Improving_planning_performance_2022_WEB.pdf

Annex 1: Further details on planning application data sources

Application Category (Sheffield City Region)	In scope?	Application numbers	Repeat number
advert	Yes	PAS	Share of no fee apps from Sheffield City Region data
certificate	Yes	PAS	No repeats
condition	Yes	PAS	No repeats
EIA	No	-	-
heritage	No	PAS	-
householder	Yes	PAS	Share of no fee apps from Sheffield City Region data
majormajor	Yes	PAS	Share of no fee apps from Sheffield City Region data
minerals	No data	-	-
minor	Yes	PAS	Share of no fee apps from Sheffield City Region data
minormajor	Yes	PAS	Share of no fee apps from Sheffield City Region data
NMA	Yes	DLUHC data	No repeats
notification	Yes	NA	No repeats
preapp	No	-	-
prior	Yes	DLUHC data	No repeats
tree	No	-	-
use	Yes	PAS	Share of no fee apps from Sheffield City Region data
waste	No	-	-

Annex 2: Impacts of Options, by year (Q4 2023 to Q3 20233)

Option 2		2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033
Benefits to LPAs	High	16.2	60.8	59.1	58.8	58.3	58.5	58.6	58.5	58.1	57.5	42.6
	Central	16.1	60.3	58.6	58.4	57.9	56.1	54.0	52.0	50.1	48.2	34.9
	Low	15.9	59.9	58.2	58.0	57.5	55.1	52.4	49.8	47.4	45.0	32.1
Costs to business	High	13.9	52.1	50.8	50.9	50.7	51.3	51.8	52.0	51.9	51.7	38.4
	Central	13.9	52.1	50.8	50.9	50.7	49.3	47.5	45.9	44.3	42.7	30.9
	Low	13.9	52.1	50.8	50.9	50.7	48.7	46.3	44.0	41.9	39.8	28.4
Costs to householders	High	2.3	8.7	8.3	8.0	7.6	7.2	6.8	6.5	6.2	5.9	4.2
	Central	2.2	8.2	7.9	7.5	7.2	6.8	6.5	6.1	5.8	5.6	4.0
	Low	2.0	7.8	7.4	7.1	6.7	6.4	6.1	5.8	5.5	5.2	3.7

Option 2 + A		2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033
Benefits to LPAs	High	37.2	144.7	145.4	152.2	161.7	174.8	188.6	202.4	216.1	229.7	181.9
	Central	37.2	139.8	135.8	137.2	140.9	147.2	153.5	159.1	164.1	168.6	129.0
	Low	36.6	137.5	133.5	135.0	138.7	138.6	137.1	135.5	133.8	132.0	97.5
Costs to business	High	31.6	118.2	115.1	117.2	121.1	127.5	134.0	139.8	145.0	149.7	115.0
	Central	31.6	118.2	115.1	117.2	121.1	122.5	122.9	123.3	123.5	123.7	92.5
	Low	31.6	118.2	115.1	117.2	121.1	121.1	119.8	118.3	116.8	115.2	85.0
Costs to householders	High	5.7	21.6	20.7	20.1	19.8	19.7	19.5	19.3	19.1	18.9	14.0
	Central	5.4	20.4	19.5	19.0	18.7	18.6	18.4	18.3	18.1	17.8	13.2
	Low	5.0	19.3	18.4	17.9	17.7	17.5	17.4	17.2	17.0	16.8	12.4

Option 2 + B		2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033
Benefits to LPAs	High	22.5	84.6	82.2	81.7	80.9	81.0	81.1	80.8	80.2	79.3	58.7
	Central	22.3	83.8	81.4	81.0	80.2	77.7	74.8	72.0	69.3	66.7	48.2
	Low	22.1	83.0	80.6	80.3	79.5	76.3	72.5	68.9	65.5	62.2	44.4
Costs to business	High	18.7	70.2	68.4	68.5	68.3	69.1	69.8	70.0	70.0	69.6	51.7
	Central	18.7	70.2	68.4	68.5	68.3	66.4	64.0	61.8	59.6	57.5	41.6
	Low	18.7	70.2	68.4	68.5	68.3	65.6	62.4	59.3	56.4	53.6	38.2
Costs to households	High	3.8	14.4	13.8	13.2	12.5	11.9	11.3	10.8	10.2	9.7	6.9
	Central	3.6	13.7	13.0	12.5	11.9	11.3	10.7	10.2	9.7	9.2	6.6
	Low	3.4	12.9	12.3	11.7	11.2	10.6	10.1	9.6	9.1	8.7	6.2

Option 2 + A + B		2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033
Benefits to LPAs	High	45.4	170.7	165.7	167.1	170.8	177.5	184.2	190.2	195.5	200.0	152.5
	Central	45.0	169.1	164.1	165.6	169.3	170.1	169.8	169.3	168.8	168.1	125.2
	Low	44.6	167.5	162.6	164.1	167.9	167.1	164.6	162.1	159.5	156.9	115.5
Costs to business	High	37.8	141.6	137.9	140.2	144.4	151.5	158.6	164.9	170.6	175.5	134.5
	Central	37.8	141.6	137.9	140.2	144.4	145.5	145.5	145.5	145.3	145.0	108.2
	Low	37.8	141.6	137.9	140.2	144.4	143.9	141.8	139.6	137.4	135.1	99.5
Costs to households	High	7.6	29.1	27.7	26.9	26.4	26.0	25.7	25.3	24.9	24.4	18.0
	Central	7.2	27.5	26.2	25.4	25.0	24.6	24.2	23.9	23.5	23.1	17.0
	Low	6.8	25.9	24.7	23.9	23.5	23.2	22.8	22.5	22.1	21.8	16.0

Option 3		2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033
Benefits to LPAs	High	13.9-15.7	52.1-59.1	50.8-57.4	50.9-57.3	50.7-56.8	51.3-57	51.8-57.3	52-57.2	51.9-56.9	51.7-56.4	38.4-41.7
	Central	13.9-15.6	52.1-58.7	50.8-57.1	50.9-56.9	50.7-56.4	49.3-54.7	47.5-52.7	45.9-50.8	44.3-48.9	42.7-47.1	30.9-34.1
	Low	13.9-15.5	52.1-58.3	50.8-56.7	50.9-56.6	50.7-56.1	48.7-53.9	46.3-51.2	44-48.7	41.9-46.3	39.8-44	28.4-31.4
Costs to business	High	13.9	52.1	50.8	50.9	50.7	51.3	51.8	52	51.9	51.7	38.4
	Central	13.9	52.1	50.8	50.9	50.7	49.3	47.5	45.9	44.3	42.7	30.9
	Low	13.9	52.1	50.8	50.9	50.7	48.7	46.3	44	41.9	39.8	28.4
Costs to householders	High	0-1.8	0-7	0-6.7	0-6.4	0-6.1	0-5.8	0-5.5	0-5.2	0-4.9	0-4.7	0-3.4
	Central	0-1.7	0-6.6	0-6.3	0-6	0-5.7	0-5.4	0-5.2	0-4.9	0-4.7	0-4.4	0-3.2
	Low	0-1.6	0-6.2	0-5.9	0-5.7	0-5.4	0-5.1	0-4.9	0-4.6	0-4.4	0-4.2	0-3

Option 3 + A		2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033
Benefits to LPAs	High	34.3-36.6	128.5-137.6	125-133.6	126.9-135.2	130.9-138.9	137.5-145.3	144.1-151.6	150-157.3	155.4-162.4	160.1-166.9	122.8-127.8
	Central	34.1-36.4	128-136.5	124.4-132.6	126.3-134.2	130.4-137.9	131.9-139.3	132.5-139.6	133-139.8	133.3-139.9	133.5-139.9	99.9-104.6
	Low	34-36.1	127.4-135.4	123.9-131.6	125.8-133.2	129.8-137	130-136.9	128.8-135.5	127.4-133.9	126-132.3	124.5-130.5	92-96.4
Costs to business	High	31.6	118.2	115.1	117.2	121.1	127.5	134	139.8	145	149.7	115
	Central	31.6	118.2	115.1	117.2	121.1	122.5	122.9	123.3	123.5	123.7	92.5
	Low	31.6	118.2	115.1	117.2	121.1	121.1	119.8	118.3	116.8	115.2	85
Costs to householders	High	2.7-5.1	10.3-19.4	9.9-18.5	9.7-18	9.8-17.8	10-17.7	10.1-17.6	10.2-17.5	10.3-17.4	10.4-17.2	7.8-12.7
	Central	2.6-4.8	9.8-18.3	9.3-17.5	9.1-17	9.3-16.8	9.4-16.8	9.6-16.7	9.7-16.5	9.8-16.4	9.8-16.2	7.4-12
	Low	2.4-4.5	9.2-17.2	8.8-16.5	8.6-16	8.7-15.9	8.9-15.8	9-15.7	9.1-15.6	9.2-15.4	9.3-15.3	7-11.3

Option 3 + B		2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033
Benefits to LPAs	High	19.9-22	74.8-82.6	72.7-80.3	72.7-79.9	72.3-79.1	72.9-79.4	73.4-79.5	73.4-79.3	73.2-78.8	72.7-78	53.9-57.7
	Central	19.9-21.8	74.5-82	72.5-79.6	72.5-79.3	72.1-78.6	70-76.1	67.4-73.3	65-70.6	62.7-68	60.4-65.4	43.7-47.3
	Low	19.8-21.6	74.3-81.3	72.3-79	72.3-78.7	71.9-78	69-74.8	65.6-71.1	62.3-67.6	59.3-64.2	56.3-61.1	40.2-43.6
Costs to business	High	18.7	70.2	68.4	68.5	68.3	69.1	69.8	70	70	69.6	51.7
	Central	18.7	70.2	68.4	68.5	68.3	66.4	64	61.8	59.6	57.5	41.6
	Low	18.7	70.2	68.4	68.5	68.3	65.6	62.4	59.3	56.4	53.6	38.2
Costs to householders	High	1.2-3.3	4.6-12.5	4.4-11.9	4.2-11.4	4-10.8	3.8-10.3	3.6-9.8	3.4-9.3	3.2-8.8	3.1-8.4	2.2-6
	Central	1.1-3.1	4.3-11.8	4.1-11.3	4-10.8	3.8-10.2	3.6-9.7	3.4-9.2	3.2-8.8	3.1-8.4	2.9-7.9	2.1-5.7
	Low	1.1-2.9	4.1-11.1	3.9-10.6	3.7-10.1	3.5-9.6	3.4-9.2	3.2-8.7	3-8.3	2.9-7.9	2.7-7.5	2-5.3

Option 3 + A + B		2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033
Benefits to LPAs	High	42.1-44.8	157.9-168.1	153.4-163.2	155.3-164.7	159.5-168.5	166.6-175.3	173.6-182.1	179.9-188.1	185.5-193.5	190.4-198.1	145.6-151.2
	Central	41.8-44.4	157-166.7	152.6-161.8	154.5-163.4	158.6-167.2	159.8-168.1	159.8-167.8	159.6-167.4	159.4-166.9	159.1-166.3	118.7-123.9
	Low	41.6-44	156.1-165.2	151.7-160.4	153.7-162	157.8-165.9	157.3-165.1	155.2-162.7	153-160.3	150.7-157.8	148.4-155.2	109.3-114.3
Costs to business	High	37.8	141.6	137.9	140.2	144.4	151.5	158.6	164.9	170.6	175.5	134.5
	Central	37.8	141.6	137.9	140.2	144.4	145.5	145.5	145.5	145.3	145	108.2
	Low	37.8	141.6	137.9	140.2	144.4	143.9	141.8	139.6	137.4	135.1	99.5
Costs to householders	High	4.3-6.9	16.3-26.5	15.5-25.3	15.1-24.5	15.1-24.1	15.1-23.8	15.1-23.5	15-23.2	14.9-22.9	14.9-22.5	11-16.6
	Central	4-6.6	15.4-25	14.7-23.9	14.3-23.2	14.2-22.8	14.2-22.5	14.2-22.2	14.2-21.9	14.1-21.6	14-21.3	10.4-15.7
	Low	3.8-6.2	14.5-23.6	13.8-22.5	13.5-21.8	13.4-21.5	13.4-21.2	13.4-21	13.4-20.7	13.3-20.4	13.2-20.1	9.8-14.8

Option 4		2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033
Benefits to LPAs	High	15.4	62.1	62.2	62.2	63.1	64.4	65.8	67.2	68.7	70.2	53.5
	Central	14.5	58.5	58.6	58.8	59.8	60.9	61.9	62.8	63.6	64.3	48.5
	Low	13.5	54.8	55.1	55.3	56.4	57.6	58.6	59.4	60.0	60.5	45.4
Costs to business	High	- 1.7	- 4.3	- 2.4	- 0.5	2.1	4.9	7.8	10.8	13.8	16.8	14.6
	Central	- 1.7	- 4.3	- 2.4	- 0.5	2.1	4.7	7.2	9.5	11.7	13.8	11.7
	Low	- 1.7	- 4.3	- 2.4	- 0.5	2.1	4.6	7.0	9.1	11.1	12.9	10.7
Costs to householders	High	17.1	66.4	64.6	62.7	61.1	59.5	57.9	56.4	54.9	53.4	39.0
	Central	16.1	62.8	61.0	59.3	57.7	56.2	54.8	53.3	51.9	50.5	36.8
	Low	15.2	59.1	57.5	55.9	54.4	53.0	51.6	50.2	48.9	47.6	34.7

Option 1 + PG	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033
Benefits to LPAs from increased fee revenue	High	-	-	-	-	-	-	-	-	-	-
	Central	-	-	-	-	-	-	-	-	-	-
	Low	-	-	-	-	-	-	-	-	-	-
Costs of LPA Refunds	High	1.7	6.2	6.0	6.0	5.9	5.8	5.8	5.7	5.6	4.1
	Central	1.6	6.1	5.9	5.9	5.8	5.6	5.4	5.0	4.8	3.5
	Low	1.6	6.0	5.9	5.8	5.7	5.5	5.2	4.7	4.5	3.2
Net Impact on LPAs	High	-	-	-	-	-	-	-	-	-	-
	Central	1.7	6.2	6.0	6.0	5.9	5.9	5.8	5.7	5.6	4.1
	Low	-	-	-	-	-	-	-	-	-	-
Benefits to businesses from refunds	High	1.2	4.5	4.4	4.4	4.4	4.4	4.4	4.5	4.4	3.3
	Central	1.2	4.5	4.4	4.4	4.4	4.2	4.1	3.8	3.7	2.7
	Low	1.2	4.5	4.4	4.4	4.4	4.2	4.0	3.6	3.4	2.4
Costs of businesses from increased fees	High	-	-	-	-	-	-	-	-	-	-
	Central	-	-	-	-	-	-	-	-	-	-
	Low	-	-	-	-	-	-	-	-	-	-
Net Impact on Businesses	High	1.2	4.5	4.4	4.4	4.4	4.4	4.5	4.5	4.4	3.3
	Central	1.2	4.5	4.4	4.4	4.4	4.2	3.9	3.8	3.7	2.7
	Low	1.2	4.5	4.4	4.4	4.4	4.2	3.8	3.6	3.4	2.4

	Low	1.2	4.5	4.4	4.4	4.4	4.4	4.4	4.2	4.0	3.8	3.6	3.4	2.4
Benefits to householders from refunds	High	0.5	1.8	1.7	1.6	1.5	1.5	1.4	1.4	1.4	1.3	1.2	1.2	0.8
	Central	0.4	1.7	1.6	1.5	1.4	1.4	1.3	1.4	1.3	1.2	1.2	1.1	0.8
	Low	0.4	1.6	1.5	1.4	1.4	1.2	1.2	1.1	1.1	1.1	1.1	1.1	0.8
Costs of householders from increased fees	High	-	-	-	-	-	-	-	-	-	-	-	-	-
	Central	-	-	-	-	-	-	-	-	-	-	-	-	-
	Low	-	-	-	-	-	-	-	-	-	-	-	-	-
Net Impact on Householders	High	0.5	1.8	1.7	1.6	1.5	1.4	1.4	1.4	1.4	1.3	1.2	1.2	0.8
	Central	0.4	1.7	1.6	1.5	1.4	1.3	1.3	1.4	1.3	1.2	1.2	1.1	0.8
	Low	0.4	1.6	1.5	1.4	1.4	1.2	1.2	1.3	1.2	1.2	1.1	1.1	0.8

Option 2 + A + B + PG		2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033
Benefits to LPAs from increased fee revenue	High	45.4	170.7	165.7	167.1	170.8	177.5	184.2	190.2	195.5	200.0	152.5
	Centra l	45.0	169.1	164.1	165.6	169.3	170.1	169.8	169.3	168.8	168.1	125.2
	Low	44.6	167.5	162.6	164.1	167.9	167.1	164.6	162.1	159.5	156.9	115.5
Costs of LPA Refunds	High	1.65	6.23	6.04	5.97	5.88	5.85	5.83	5.78	5.71	5.62	4.14
	Centra l	1.63	6.13	5.94	5.89	5.80	5.60	5.39	5.18	4.98	4.79	3.45
	Low	1.60	6.04	5.85	5.80	5.71	5.48	5.21	4.95	4.70	4.47	3.19
Net Impact on LPAs	High	43.8	164.4	159.6	161.1	164.9	171.7	178.4	184.4	189.8	194.4	148.4
	Centra l	43.4	162.9	158.2	159.7	163.5	164.5	164.4	164.2	163.8	163.4	121.8
	Low	43.0	161.4	156.8	158.3	162.2	161.6	159.4	157.2	154.8	152.4	112.3
Benefits to businesses from refunds	High	1.2	4.5	4.4	4.4	4.4	4.4	4.4	4.5	4.5	4.4	3.3
	Centra l	1.2	4.5	4.4	4.4	4.4	4.2	4.1	3.9	3.8	3.7	2.7
	Low	1.2	4.5	4.4	4.4	4.4	4.2	4.0	3.8	3.6	3.4	2.4
Costs of businesses from increased fees	High	37.8	141.6	137.9	140.2	144.4	151.5	158.6	164.9	170.6	175.5	134.5
	Centra l	37.8	141.6	137.9	140.2	144.4	145.5	145.5	145.5	145.3	145.0	108.2
	Low	37.8	141.6	137.9	140.2	144.4	143.9	141.8	139.6	137.4	135.1	99.5
Net Impact on Businesses	High	-	-	-	-	-	-	-	-	-	-	-
	Centra l	36.6	137.2	133.6	135.8	140.0	147.1	154.1	160.5	166.1	171.1	131.3
		-	-	-	-	-	-	-	-	-	-	-
		36.6	137.2	133.6	135.8	140.0	141.3	141.5	141.5	141.5	141.4	105.6

Low	-	36.6	-	137.2	-	133.6	-	135.8	-	140.0	-	139.7	-	137.8	-	135.8	-	133.8	-	131.7	-	97.0
Benefits to householders from refunds	High	0.5	1.8	1.7	1.7	1.6	1.5	1.6	1.5	1.5	1.4	1.4	1.4	1.4	1.3	1.3	1.3	1.2	1.2	1.2	0.8	0.8
	Centra	0.4	1.7	1.6	1.6	1.5	1.4	1.5	1.4	1.4	1.4	1.4	1.3	1.3	1.2	1.2	1.2	1.1	1.1	1.1	0.8	0.8
	Low	0.4	1.6	1.5	1.5	1.4	1.4	1.4	1.4	1.4	1.3	1.3	1.2	1.2	1.2	1.2	1.1	1.1	1.1	1.1	0.8	0.8
Costs of householders from increased fees	High	7.6	29.1	27.7	27.7	26.9	26.4	26.9	26.4	26.4	26.0	26.0	25.7	25.7	25.3	25.3	24.9	24.9	24.4	24.4	18.0	18.0
	Centra	7.2	27.5	26.2	26.2	25.4	25.0	25.4	25.0	25.0	24.6	24.6	24.2	24.2	23.9	23.9	23.5	23.5	23.1	23.1	17.0	17.0
	Low	6.8	25.9	24.7	24.7	23.9	23.5	23.9	23.5	23.5	23.2	23.2	22.8	22.8	22.5	22.5	22.1	22.1	21.8	21.8	16.0	16.0
Net Impact on Householders	High	-	7.1	27.3	26.1	25.3	24.9	25.3	24.9	24.6	24.6	24.3	24.3	24.0	24.0	23.6	23.6	23.3	23.3	23.3	17.2	17.2
	Centra	-	6.8	25.8	24.6	23.9	23.5	23.9	23.5	23.2	23.2	22.9	22.9	22.6	22.6	22.3	22.3	22.0	22.0	22.0	16.2	16.2
	Low	-	6.4	24.3	23.2	22.5	22.2	22.5	22.2	21.9	21.9	21.6	21.6	21.3	21.3	21.0	21.0	20.7	20.7	20.7	15.3	15.3

Option 3 + A + B + PG		2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033
Benefits to LPAs from increased fee revenue	High	44.8	168.1	163.2	164.7	168.5	175.3	182.1	188.1	193.5	198.1	151.2
	Centra l	44.4	166.7	161.8	163.4	167.2	168.1	167.8	167.4	166.9	166.3	123.9
	Low	44.0	165.2	160.4	162.0	165.9	165.1	162.7	160.3	157.8	155.2	114.3
Costs of LPA Refunds	High	1.65	6.23	6.04	5.97	5.88	5.85	5.83	5.78	5.71	5.62	4.14
	Centra l	1.63	6.13	5.94	5.89	5.80	5.60	5.39	5.18	4.98	4.79	3.45
	Low	1.60	6.04	5.85	5.80	5.71	5.48	5.21	4.95	4.70	4.47	3.19
Net Impact on LPAs	High	43.1	161.9	157.2	158.8	162.6	169.5	176.3	182.4	187.8	192.4	147.0
	Centra l	42.7	160.5	155.9	157.5	161.4	162.5	162.4	162.2	161.9	161.5	120.5
	Low	42.4	159.2	154.6	156.2	160.2	159.6	157.5	155.3	153.1	150.7	111.1
Benefits to businesses from refunds	High	1.2	4.5	4.4	4.4	4.4	4.4	4.4	4.5	4.5	4.4	3.3
	Centra l	1.2	4.5	4.4	4.4	4.4	4.2	4.1	3.9	3.8	3.7	2.7
	Low	1.2	4.5	4.4	4.4	4.4	4.2	4.0	3.8	3.6	3.4	2.4
Costs of businesses from increased fees	High	37.8	141.6	137.9	140.2	144.4	151.5	158.6	164.9	170.6	175.5	134.5
	Centra l	37.8	141.6	137.9	140.2	144.4	145.5	145.5	145.5	145.3	145.0	108.2
	Low	37.8	141.6	137.9	140.2	144.4	143.9	141.8	139.6	137.4	135.1	99.5
Net Impact on Businesses	High	-	-	-	-	-	-	-	-	-	-	-
	Centra l	36.6	137.2	133.6	135.8	140.0	147.1	154.1	160.5	166.1	171.1	131.3
		-	-	-	-	-	-	-	-	-	-	-
		36.6	137.2	133.6	135.8	140.0	141.3	141.5	141.5	141.5	141.4	105.6

Low	-	36.6	-	137.2	-	133.6	-	135.8	-	140.0	-	139.7	-	137.8	-	135.8	-	133.8	-	131.7	-	97.0
Benefits to householders from refunds	High	0.5	1.8	1.7	1.6	1.5	1.4	1.5	1.4	1.4	1.4	1.4	1.4	1.4	1.3	1.3	1.3	1.2	1.2	1.2	1.2	0.8
	Centra	0.4	1.7	1.6	1.5	1.4	1.4	1.4	1.4	1.4	1.4	1.4	1.4	1.3	1.2	1.2	1.2	1.1	1.1	1.1	1.1	0.8
	Low	0.4	1.6	1.5	1.4	1.4	1.4	1.4	1.4	1.4	1.4	1.3	1.3	1.2	1.2	1.2	1.2	1.1	1.1	1.1	1.1	0.8
Costs of householders from increased fees	High	6.9	26.5	25.3	24.5	24.1	23.8	24.1	23.8	24.1	23.8	23.8	23.8	23.5	23.5	23.2	23.2	22.9	22.9	22.5	22.5	16.6
	Centra	6.6	25.0	23.9	23.2	22.8	22.5	22.8	22.5	22.8	22.5	22.5	22.5	22.2	22.2	21.9	21.9	21.6	21.6	21.3	21.3	15.7
	Low	6.2	23.6	22.5	21.8	21.5	21.2	21.5	21.2	21.5	21.2	21.2	21.2	21.0	21.0	20.7	20.7	20.4	20.4	20.1	20.1	14.8
Net Impact on Householders	High	-	24.7	23.6	22.9	22.6	22.4	22.6	22.4	22.6	22.4	22.4	22.4	22.2	22.2	21.9	21.9	21.6	21.6	21.3	21.3	15.8
	Centra	-	23.4	22.3	21.7	21.4	21.2	21.4	21.2	21.4	21.2	21.2	21.2	20.9	20.9	20.7	20.7	20.4	20.4	20.2	20.2	14.9
	Low	-	22.0	21.0	20.4	20.1	19.9	20.1	19.9	20.1	19.9	19.9	19.9	19.7	19.7	19.5	19.5	19.3	19.3	19.0	19.0	14.0

Option 4 + PG		2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033
Benefits to LPAs from increased fee revenue	High	15.4	62.1	62.2	62.2	63.1	64.4	65.8	67.2	68.7	70.2	53.5
	Centra l	14.5	58.5	58.6	58.8	59.8	60.9	61.9	62.8	63.6	64.3	48.5
	Low	13.5	54.8	55.1	55.3	56.4	57.6	58.6	59.4	60.0	60.5	45.4
Costs of LPA Refunds	High	2.86	10.95	10.69	10.61	10.52	10.53	10.54	10.52	10.48	10.41	7.74
	Centra l	2.79	10.67	10.42	10.35	10.26	10.04	9.79	9.54	9.30	9.07	6.62
	Low	2.72	10.39	10.15	10.09	10.01	9.74	9.41	9.09	8.78	8.48	6.15
Net Impact on LPAs	High	12.6	51.2	51.5	51.6	52.6	53.9	55.2	56.7	58.2	59.8	45.8
	Centra l	11.7	47.8	48.2	48.4	49.5	50.9	52.1	53.3	54.3	55.3	41.9
	Low	10.8	44.4	44.9	45.3	46.4	47.9	49.2	50.3	51.2	52.0	39.3
Benefits to businesses from refunds	High	1.3	5.1	4.9	4.8	4.6	4.4	4.3	4.1	4.0	3.9	2.8
	Centra l	1.2	4.8	4.7	4.5	4.3	4.2	4.1	3.9	3.8	3.7	2.7
	Low	1.2	4.5	4.4	4.2	4.1	4.0	3.8	3.7	3.6	3.4	2.5
Costs of businesses from increased fees	High	-	-	-	-	-	-	-	-	-	-	-
	Centra l	1.7	4.3	2.4	0.5	2.1	4.9	7.8	10.8	13.8	16.8	14.6
	Low	-	-	-	-	-	-	-	-	-	-	-
Net Impact on Businesses	High	3.0	9.4	7.3	5.3	2.5	0.5	3.5	6.7	9.8	12.9	11.7
	Centra l	2.9	9.2	7.0	5.0	2.3	0.5	3.1	5.6	8.0	10.2	9.0

	Low	2.8	8.9	6.8	4.7	2.0	0.7	3.2	5.4	7.5	9.4	-	8.3
Benefits to householders from refunds													
	High	1.5	5.9	5.8	5.8	5.9	6.1	6.2	6.4	6.5	6.5		4.9
	Centra	1.5	5.9	5.8	5.8	5.9	5.8	5.7	5.6	5.5	5.4		4.0
	Low	1.5	5.9	5.8	5.8	5.9	5.8	5.6	5.4	5.2	5.0		3.7
Costs of householders from increased fees													
	High	17.1	66.4	64.6	62.7	61.1	59.5	57.9	56.4	54.9	53.4		39.0
	Centra	16.1	62.8	61.0	59.3	57.7	56.2	54.8	53.3	51.9	50.5		36.8
	Low	15.2	59.1	57.5	55.9	54.4	53.0	51.6	50.2	48.9	47.6		34.7
Net Impact on Householders													
	High	15.5	60.6	58.8	56.9	55.2	53.4	51.7	50.0	48.4	46.9	-	34.0
	Centra	-	-	-	-	-	-	-	-	-	-	-	-
	Low	14.6	56.9	55.3	53.4	51.8	50.4	49.0	47.7	46.4	45.1	-	32.9
	Low	-	-	-	-	-	-	-	-	-	-	-	-
	Low	13.7	53.3	51.7	50.0	48.5	47.2	46.0	44.8	43.7	42.5	-	31.0