

PAS Planning Fees Survey:

Results & Reflections

27 Nov 2025

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This afternoon

PIB – reminder

Survey - key findings summary

A closer look at some of the numbers

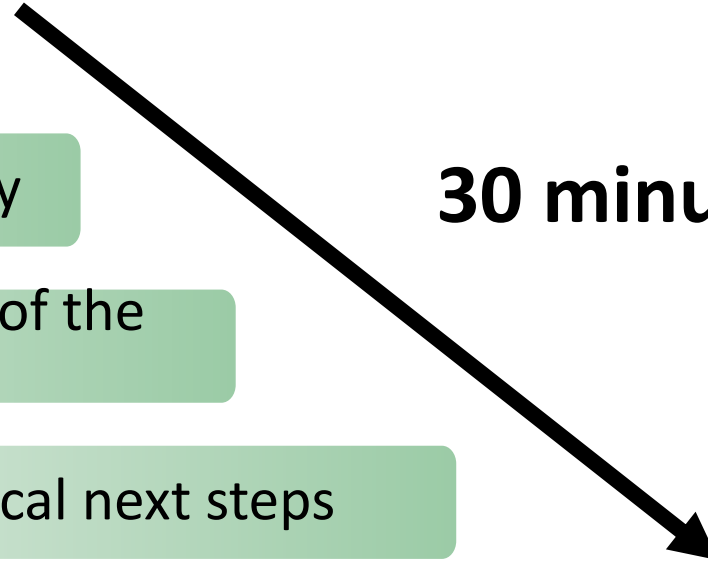
Some practical next steps

MHCLG update

30 minutes

Discussion / open forum

1 hour



Planning & Infrastructure Bill (PIB)



No major changes: the fundamental structure of Clause 48 is still as originally drafted



Local variation model based on national fee baseline



Fees must **not exceed the cost** of carrying out the decision-making function (i.e. not plan making, not enforcement)



Nothing carved out e.g. listed buildings



Income should be applied to and improve relevant planning functions,



Safeguards are maintained: a regulatory framework and a SoS “direction” to rein in inappropriate fees.

The Survey; results and reflections



Key findings

Fees need to
increase!

A strong case for reviewing current fees across the board (the most underpriced application = **60% price gap**, the least = **17% price gap**)

National fee schedule **not the best place** to achieve full cost recovery (FCR)

FCR obviously popular especially among members (and accountants)

There is a gap; evidence & knowledge (hence confidence). **Evidence base** for localised fee setting falls some way behind discretionary fees

Big concerns - the work involved, transparency, accuracy, consistency

All planning fees in the **spotlight** – transparency

Yo yo-ing fees **budgeting** for localised fees – traditionally backward looking, defensible cost models

Key findings

No real surprises (that's good) except perhaps section 73s

Most
underpriced /
priority

Removal/variation
of condition
(major): **92%** say
underpriced.

Discharge of
condition(s): **92%**
say underpriced

Outline applications
(especially major):
88% say
underpriced

Removal/variation
of condition (non-
major): **88%** say
underpriced

Key findings

Least underpriced

Householder applications – one of least underpriced but high priority for review – **volume matters.**

Little variation in views across the regions

Many fee categories need some refinement

30% of councils ready to set their own fees, **60%** uncertain.

Survey statistics

- Launched 7 August
- Closed 19 September
- In the field for 6 weeks
- Online format

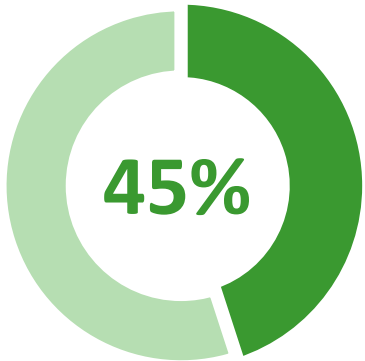
- Sent to English Local Planning Authorities (LPAs), and national park authorities
- 1 response per council

- Sent to Heads of Planning, or equivalent
- Could be delegated to the most appropriate council officer

- 327 potential responses
- 147 responses received
- 45% response rate

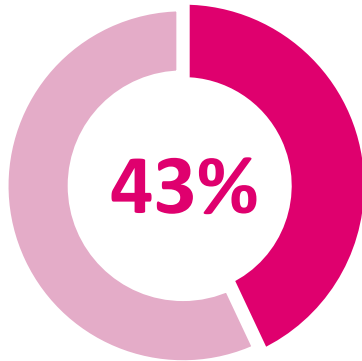
Distribution/response

District



Delivered 164, responses 73

County



Delivered 21, responses 9

London boroughs

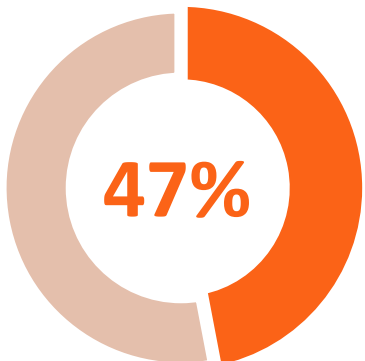


Delivered 33, responses 17

• **By Region**

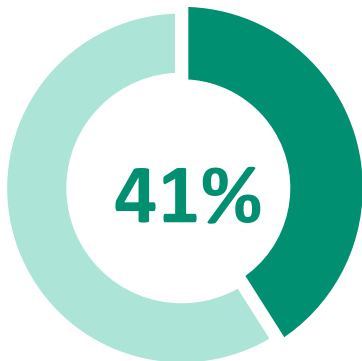
Ranged from 55% (South-West) to 33% (North-East)

Met. Districts



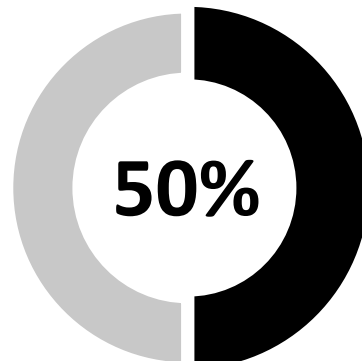
Delivered 36, responses 17

Unitary

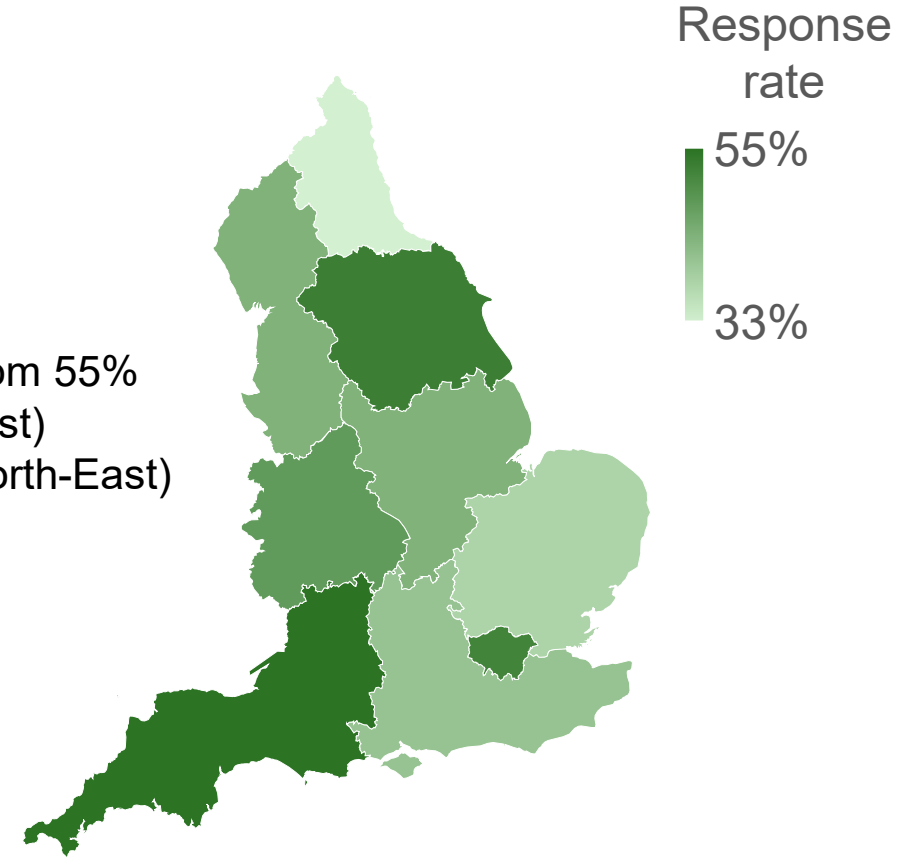


Delivered 63, responses 26

National parks



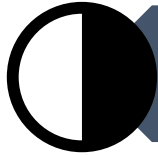
Delivered 10, responses 5



National fees - we asked:



Your view - nationally set fee Vs cost recovery



Over 80 different application types - we cut to about 40

Overpriced -
exceeds typical
cost incurred

About right –
reflective of cost
incurred

**Moderately
underpriced** -
covers 75-99% of
cost

**Significantly
underpriced** -
covers between
50-74% of cost

**Seriously
underpriced** -
covers less than
50% of cost

Most often considered underpriced

Application type	%
Discharge of condition(s)	92%
Removal or variation of a condition (major)	92%
Outline applications (non-major)	88%
Outline applications (major)	88%
Removal or variation of a condition (non-major)	88%
Prior approval (upward exts/new houses, 10-50 units)	87%
Erection of dwellings (non-major)	87%
Prior approval (upward exts, new houses, <10 units)	86%
Other change of use	85%

Application type	%
Waste (up to 15 ha)	85%
Prior approval (upward exts, +50 units)	85%
Reserved matters	85%
Change of use (10-50 units)	84%
Prior approval	83%
Minerals (up to 15 ha)	82%
Change of use +50 units	82%
Erection of dwellings (medium/major)	82%

Priorities

Application type	Consider under-priced	Cost recovery level	Priority to address
Removal/variation condition (e.g. Section 73s) (major)	92%	57%	39%
Discharge of condition(s)	92%	62%	35%
Outline applications (major)	88%	64%	32%
Householder applications	64%	83%	23%
Erection of dwellings (major - more than 50 units)	79%	72%	21%
Erection of dwellings (non-major - fewer than 10 units)	87%	70%	17%
Erection of dwellings (medium/major - 10-50 units)	82%	70%	17%
Prior approval (under the permitted development rights listed)	83%	70%	16%
Removal or variation of a condition (e.g. Section 73s) (non-major)	88%	64%	11%

Schedule fee as %age of cost



Each answer band assigned a %age value to represent the schedule fee as a proportion of the typical costs incurred

Assigned %age x no. respondents = estimated cost recovery

Overpriced –
120% of cost
incurred

About right –
100% of cost
incurred

Moderately
underpriced -
87% of cost
incurred

Significantly
underpriced -
62% of cost
incurred

Seriously
underpriced -
40% of cost
incurred

If 50% said “seriously underpriced” (40%) and 50% said “about right” (100%):

$0.5 \times 40\% = 20\%$ / $0.5 \times 100\% = 50\%$

Add them = **70%** - **On average, the current fee is estimated to be about 70% of the real cost.**

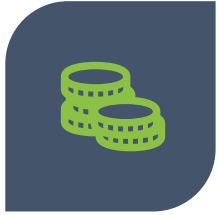
Priorities – impact on fees

Application type	Current fee	Cost recovery level	Revised fee	Diff
Removal/variation condition (e.g. S73s) (major)	£2,000	57%	£3,500	£1,500
Discharge of condition(s)	£86	62%	£139	£53
Outline applications (major)	£205,943	64%	£322,916	£116,973
Householder applications	£528	83%	£638	£110
Erection of dwellings (major - more than 50 units)	£411,885	72%	£570,569	£158,684
Erection of dwellings (non-major - fewer than 10 units)	£588 p/d	70%	£836 p/d	£248
Erection of dwellings (medium/major - 10-50 units)	£635 p/d	70%	£909	£274
Prior approval (under the permitted development rights listed)	£240	70%	£345	£105
Removal or variation of a condition (Section 73s) (non-major)	£586	64%	£916	£330

7 most underpriced

Application type	Schedule fee / % of costs	Current schedule fee(s)	Estimated typical costs incurred
Remove/vary condition (major)	57%	£2,000	£3,500
Discharge of condition(s)	62%	£86 or £298	£140 or £480
Other operations for the winning and working of minerals (not more than 15 hectares)	63%	£321 per 0.1ha	£500 per 0.1ha
Operations drilling oil / gas (up to 7.5 hectares)	63%	£698 per 0.1ha	£1,100 per 0.1ha
Waste (not more than 15 hectares)	64%	£321 per 0.1ha	£500 per 0.1ha
Outline applications (major)	64%	£635 per 0.1 ha to £205,943 maximum	£1,000 per 0.1ha to £320,000 maximum
Remove/vary condition (non-major)	64%	£586	£920

General feedback – key themes



THEME 1: FEE
INEQUITY
ACROSS LOCAL
AUTHORITIES



THEME 2:
ADDITIONAL
FEES FOR
COMPLEX OR
HIGH-IMPACT
APPLICATION



THEME 3:
DISAGGREGATION
OF FEES FOR
SECTION 73 AND
CONDITIONS



THEME 4: MORE
GRANULAR FEE
CATEGORIES
BASED ON
DEVELOPMENT
TYPE.



THEME 5: HIGHER
FEES FOR
RETROSPECTIVE
APPLICATIONS



THEME 6: MOVE AWAY
FROM SITE AREA-
BASED



THEME 7: ALIGN PRIOR
APPROVAL FEES WITH
ASSESSMENT EFFORT



THEME 8: CHARGE PER
CONDITION FOR DISCHARGE
APPLICATIONS

Key Challenges



IMPACT OF LOCAL GOVERNMENT REORGANISATION (LGR)



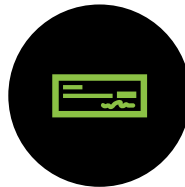
UNCERTAINTY - SYSTEMS AND METHODS FOR CALCULATION, COLLECTION AND MANAGEMENT OF FEES.



WORK INVOLVED - SETTING, JUSTIFYING, REPORTING, REVIEWING, LEVELS OF INPUT



CONSISTENCY – NEIGHBOURING COUNCILS, EXPECTATIONS, BENCHMARKING IMPORTANT



THE 'POLITICS OF FEES' - NEED TO SECURE MEMBER BUY-IN FOR ANY DECISIONS MADE.



'RACE TO THE BOTTOM' – ATTRACTING, DISCOURAGING DEVELOPMENT/INVESTMENT.



ENFORCEMENT AND COMPLIANCE COSTS, INCREASING AMOUNT OF UNAUTHORISED WORKS.

What's next?

PAS

- Government consultation?
- Publish survey results/report
- Work with LPAs on full cost recovery model and toolkit

LPAs

- Build evidence base
- Engage finance team/colleagues
- Stakeholders – dialogue
- Communications
- Monitor legislation - details