

Response ID ANON-BJ8K-JH2P-3

Submitted to **Planning Performance and Fees**

Submitted on **2020-02-14 15:46:55**

Planning Performance

1 Should we set out a vision for the Planning Service in Scotland?

Yes

Yes

1.b. Do you have any comments about the proposed vision?:

- If we are to drive local economic growth, jobs and investment we must have strong public leadership and an efficient, aspirational and delivery-focused planning service to facilitate and encourage sustainable economic growth.
- Our members agree that there need to be a properly resourced planning service. However, there need to be a greater understanding by the public sector of the often upfront costs that the private sector already pays towards delivering the planning service and the risks involved.
- SPF members have previously indicated a willingness to pay a higher planning fee for a tangible improvement in performance by planning authorities. Members would like to see an improved service particularly in relation to development management.
- It is important that Scotland continues to remain competitive, and any increase in fees paid by the private sector needs to result directly in an injection of additional resources for planning services, deliver stronger leadership that supports appropriate development and encourages new investment in our built environment.
- Unfortunately, we have yet to see full commitment by planning authorities to tie fees to better outcomes in the way that's needed.
- A move to full cost recovery by local authorities should not be done at the expense of an efficient and effective planning system, and applicants need to be assured of the value of further fee increases.

2 Is the proposed approach to the content correct?

Not Answered

3 Do you have any comments on the Proposed content of Planning Performance Reports?

Please explain your view.:

- Our members welcome the intention behind the proposed content. However, there needs to be a focus on delivery.

3.a. Do you have any comments or suggestions as to how reports should be prepared?:

- The report should contain a strong element of customer feedback.

3.b. What statistical information would be useful/valuable to include and monitor?:

- Statistics relating to the Council's handling of planning applications (eg. dealing with applications within statutory time periods, and statistics relating to the determination of planning appeals and judicial challenges) should be monitored and performance should be measured against them.
- Monitoring statistics relating to appeals and judicial challenges will contribute towards measuring performance against the proposed 'quality of decision' outcome.
- Our members are also of the view that deadlines should be set for the agreement of heads of terms for planning obligations and processing agreements and compliance with these targets should be linked to performance statistics.

3.c. What are the key indicators which you think the performance of the system and authorities should be measured against?:

The key issues for measurement are as follows:

1. Timescales, strong leadership and certainty are key to good performance.
2. Robust assessment, quality decisions, good project management and responsiveness with any extension of the statutory or agreed timescales set for the right reasons.
3. Transparency, trust and consistency is also important as well as post consent engagement.
4. Certainty is vital as resolving issues further down the line is expensive and any issues should therefore be recognised upfront.

Our members consider the following indicators to be important:

1. Meet statutory or agreed timescales then seek to demonstrate evidence of improvement.
2. Number of consents becoming delivered developments
3. Measurement of turnaround of conditions (PIIP then detail developed with clear timescales)
4. Time between consent being given and 'out of the ground'

5. Qualitative measure of knowledge sharing – this could be particularly useful to the new Planning Improvement Co-Ordinator.
6. Number of appeals on decisions and rate of successful appeals, which could evidence and highlight continuing themes.
7. How many approvals and refusals, which could also evidence and highlight continuing themes.
8. Number of recommendations from officials not taken forward by elected members

3.d. Do you have any other comments to make with regards to how the Performance of the Planning System and Authorities is measured and reported?:

3.e. Do you have any suggestions about how we could measure the outcomes from planning such as: Placemaking; Sustainable Development; Quality of decisions?:

- Community feedback would be indicative for example new homeowners; business; residents; industry; professional recognition; occupation take-up.

3.f. Do you have any suggestions about how planning's contribution to the National Outcomes contained in the National Performance Framework should be measured and presented?:

- Planning is instrumental in achieving national outcomes both directly and indirectly and balances the main drivers of the National Performance Framework. It is therefore vital that the planning system is a dynamic enabler of development and investment. This can have a positive impact on the following:

- o Economy
- o Climate change
- o Regeneration/investment
- o Building communities
- o Placemaking
- o Improving health
- o Education
- o Historic environment

- The real estate sector is a key catalyst for jobs, investment and creating places for people to live, work and enjoy. The Fraser of Allander Institute Report commissioned by the SPF found the industry contributed £4.8bn a year to the Scottish economy and sustained some 92,000 jobs either directly or indirectly.
- Commercial development is a key driver of economic growth. For every 100 FTE employees working in commercial construction activities, a further 85 are supported elsewhere in the Scottish economy; and for every £100m demand for commercial property output there is an estimated £73m added across the economy.

4 Do you agree with the proposed responsibilities of the planning improvement co-ordinator?

Not Answered

Do you have any comments/suggestions about the role?:

- The consultation paper's statement regarding the National Planning Improvement Co-ordinator's (NPIC) role/responsibilities focuses on providing advice to Ministers. It is essential that the NPIC's role also involves providing advice to local authorities to improve performance, and we see this as a key part of the role.
- The SPF is of the view that this should be a public appointment and recommendations should be made public and reported to Ministers and potentially to the Scottish Parliament.
- There should be clear independence from HOPS (new Chief Planners), SOLACE etc.
- Some members have suggested that the post could be linked to the Accounts Commission.
- Our members are also firmly of the view that utilities, agencies and private sector need to be consulted.

Planning Fees

5 Do you agree with the proposed planning fees for Category 1 - Residential Development?

Not Answered

Not Answered

5.b. Do you have any comments on the proposed fees and for calculating the planning fee?:

6 Do you agree with the proposed planning fees for Categories 2, 3, 4 and 5 - Extensions and Alterations to Existing Dwellings?

Not Answered

Not Answered

6.b. Do you have any comments on the proposed fees and for calculating the planning fee?:

7 Do you agree with the proposed planning fees for Category 6 – Retail and Leisure including extensions?

Not Answered

Not Answered

7.b. Do you have any comments on the proposed fees and for calculating the planning fee?:

8 Do you agree with the proposed planning fees for Category 7 - Business and Commercial including extensions?

Not Answered

Not Answered

8.b. Do you have any comments on the proposed fees and for calculating the planning fee?:

9 Do you agree with the proposed planning fees for Category 8 - Agricultural Buildings?

Not Answered

Not Answered

9.b. Do you have any comments on the proposed fees and for calculating the planning fee?:

10 Do you agree with the proposed planning fees for Category 9 - Glasshouses?

Not Answered

Not Answered

10.b. Do you have any comments on the proposed fees and for calculating the planning fee?:

Not Answered

Please provide reasons for your answer:

11 Do you agree with the proposed planning fees for Category 10 - Polytunnels?

Not Answered

Not Answered

11.b. Do you have any comments on the proposed fees and for calculating the planning fee?:

Not Answered

Please provide reasons for your answer:

12 Do you agree with the proposed planning fees for Category 11 – Windfarms – access tracks and calculation?

Not Answered

Not Answered

12.b. If not, could you suggest an alternative? In your response please provide any evidence that supports your view.:

12.c. Do you have any comments on the proposed fees and for calculating the planning fee?:

13 Do you agree with the proposed planning fees for Category 12 - Hydro Schemes?

Not Answered

Not Answered

13.b. Do you have any comments on the proposed fees and for calculating the planning fee?:

13.c. Could the planning fee be set using site area for the generating station and equipment with a separate calculation used for pipework? This could be similar to the fee for Fish Farms where the surface area is subject to a different fee to the seabed.:

14 Is the definition and the proposed method for calculating the planning fee correct for Category 13 - Other energy generation projects?

Not Answered

14.a. Do you have any comments on the proposed fees for calculating the planning fee?:

Not Answered

14.c. Do you have any suggestions for how the fee should be calculated?:

Not Answered

14.e. Do you have any suggestions for how the fee should be calculated?:

Not Answered

14.g. Do you have any suggestions for how the fee should be calculated?:

15 Do you agree with the proposed planning fees for Category 14 – Exploratory Drilling for Oil and Natural Gas?

Not Answered

Not Answered

15.b. Do you have any comments on the proposed fees and for calculating the planning fee?:

16 Do you agree with the proposed planning fees for Category 15 – Fish Farming?

Not Answered

Not Answered

16.b. Do you have any comments on the proposed fees and for calculating the planning fee?:

17 Do you agree with the proposed planning fees for Category 16 – Shellfish Farming?

Not Answered

Not Answered

17.b. Do you have any comments on the proposed fees and for calculating the planning fee?:

18 Do you agree with the proposed planning fees for Category 17 – Plant and Machinery?

Not Answered

Not Answered

18.b. Do you have any comments on the proposed fees and for calculating the planning fee?:

19 Do you agree with the proposed planning fees for Category 18 – Access, Car Parks etc. for Existing Uses?

Not Answered

Not Answered

19.b. Do you have any comments on the proposed fees and for calculating the planning fee?:

20 Do you agree with the proposed planning fees for Category 19 - Winning and Working of Minerals?

Not Answered

Not Answered

20.b. Do you have any comments on the proposed fees and for calculating the planning fee?:

21 Do you agree with the proposed planning fees for Category 20 - Peat?

Not Answered

Not Answered

21.b. Do you have any comments on the proposed fees and for calculating the planning fee?:

21.c. In light of the climate emergency do you agree that fees for applications relating to the winning and working of peat should continue to be considered separately from other mineral operations?:

22 Do you agree with the proposed planning fees for Category 21 – other operations?

Not Answered

Not Answered

22.b. Do you have any comments on the proposed fees and for calculating the planning fee?:

23 Do you agree with the proposed planning fees for Categories 22 and 23 – Waste Disposal and Minerals Stocking – does not cover waste management (recycling)?

Not Answered

Not Answered

23.b. Do you have any comments on the proposed fees and for calculating the planning fee?:

24 Do you agree with the proposed planning fees for Category 24 - Conversion of Flats and Houses?

Not Answered

Not Answered

24.b. Do you have any comments on the proposed fees and for calculating the planning fee?:

25 Do you agree with the proposed planning fees for Category 25 - Changes of Use of a Building?

Not Answered

Not Answered

25.b. Do you have any comments on the proposed fees and for calculating the planning fee?:

26 Do you agree with the proposed planning fees for Category 26 - Changes of Use of Land?

Not Answered

Not Answered

26.b. Do you have any comments on the proposed fees and for calculating the planning fee?:

27 Please list any types of developments not included within the proposed categories that you consider should be.

Please explain your view.:

Other Fees

28 How should applications for planning permission in principle and Approval of Matters Specified in Conditions (AMSC) be charged in future?

Please explain your view.:

- Whilst we agree with the principle, it is not clear that the quote from Circular 1/2004 re fees for AMSIC applications is properly given effect in the Fees Regulations. We note the statement that "Planning Permission in Principle and AMSC applications ultimately leads to 150% of the planning fee being paid", but against it is not clear that this is reflected in the Fees Regulations. We would suggest the opportunity is taken to make the provisions for AMSIC fees more express.

28.a. How should the fee for AMSC applications be calculated?:

Not Answered

Please explain your view.:

- We would agree that the system imposes an unfair fees burden on the first developer on sites being taken forward by multiple developers. That part of the maximum fee remaining following payment of the PPP fee should be shared amongst the development phases within the application site.

No

Please explain your view.:

The granting of a s42 application should not lead to the fee calculator being reset. There is no reason why the principle that a developer should not pay more than they would if a detailed application had been made should not apply where a s42 application is made.

29 Should the fee for cross boundary applications be split between the respective authorities?

Not Answered

Please provide reasons for your answer:

30 Do you agree or disagree with the proposal that where applications are required because permitted development rights for dwellings in conservation areas are restricted, then a reduced fee should be payable?

Not Answered

Please provide reasons for your answer:

31 Is the introduction of a fee for applying for Listed Building Consent appropriate?

Not Answered

How should that fee be set?:

• We agree that it is reasonable to consider whether fees should be paid for listed building consents, but that consideration must be given to impacts on viability and situations where listed building consent is required for minor works which would not normally require planning permission.

32 Should the fees for Hazardous Substances Consent be increased?

Not Answered

What levels do you think are appropriate? :

33 Are the proposed increases in fees for the categories below appropriate?

Not Answered

Not Answered

Not Answered

Not Answered

Please explain the reasons for your answer:

34 Are there other fees which have not been considered?

Please explain your view.:

Discretionary Charging

35 Do you think we should set out the range of services which an authority is allowed to charge for?

Yes

Please provide reasons for your answer:

If all local authorities are charging at a similar level and providing the same service that is likely to address current inconsistencies.

36 How should the fee for pre-application discussions be set?

Please explain your view.:

• As indicated above our members would welcome the formalisation of the pre-application consultation process. If all local authorities are charging at a similar level and providing the same service that is likely to address current inconsistencies. However, it should be made clear that charging should not be made for simply reiterating the local development plan policies. The service provided by Highland Council was given as a good exemplar by our members to follow.

• If applicants are being asked to pay for advice then it is critical that senior officers are involved at the outset, or alternatively case officers are empowered to provide advice that can be relied upon, and not be subject to change as a result of different personalities coming onto proposals in subsequent stages.

Yes

Please provide reasons for your answer:

• The fees for pre-application discussions should be subtracted from the full fee payable on submission of an application. This is considered appropriate given the stated intention of the increase in fees is full cost recovery. Consideration given by the authority to proposed developments during pre-application discussions is likely to reduce the amount of consideration required in the processing of the application.

• Members report paying for a pre-application consultation but finding that consultees have not paid any attention to the proposals, resulting in requests for information late in the process. That is not to say that there should also be an agreed and consistent minimum requirement for information from a prospective applicant if they wish to use the service.

• The pre-application process needs to include a meeting/site visit and assessment including comments by consultees at the very least from within the local authority. It is also vital that the advice can be relied on.

37 Do you think that there should be an additional charge for entering into a processing agreement to reflect the additional resource required to draft and agree the timescales to be included?

No

Should we set the fee for that or an upper limit allowing authorities the flexibility to set their fee within clear parameters? :

- If it is considered appropriate to allow for a fee to be imposed for processing agreements and non-material variations, we consider that this should be a flat rate set by Scottish Ministers. Applicants should receive the same service in relation to these matters across Scotland, and it is therefore considered appropriate that they be subject to a nation-wide fee level rather than a local fee rate.

38 Where a non-material variation is required should an authority be able to charge for each change which is made? Or per request?

Not Answered

Should regulations set the fee for that or an upper limit allowing authorities the flexibility to set their fee within clear parameters? :

- If it is considered appropriate to allow for a fee to be imposed for processing agreements and non-material variations, we consider that this should be a flat rate set by Scottish Ministers. Applicants should receive the same service in relation to these matters across Scotland, and it is therefore considered appropriate that they be subject to a nation-wide fee level rather than a local fee rate.

- Our members are concerned about the removal of the free second application submission in accordance with the Planning (Scotland) Act 2019. This is a particular concern in cases of minor points of refusal. They are firmly of the view that there should be a fair and proportionate approach in this instance. For example, applicants are unlikely to resubmit an application at a cost of circa £120,000 to deal with the minor changes proposed by elected members to an original application, which has been approved by officers. The 2019 Act allows planning authorities to charge for anything they do relating to the planning function under the affirmative procedure (s252 of the Town and Country Planning (Scotland) Act 1997). Planning authorities can decide to waive their fee and the regulations can set out when and when not to charge. Our members are firmly of the view that such fees should be classed as minor amendments that should not attract a charge in any regulatory proposals.

39 Should authorities be able to charge for carrying out the monitoring of conditions?

No

No

39.b. What should this be limited to?:

- It is not clear how this could be monitored or quantified. The vast majority of conditions require either some form of approval from the local authority (eg approval of a construction method statement), or ongoing compliance by the developer/occupier of a development (eg . Our members would have no control over how monitoring would take place or on what basis. This form of charge would seem to be a form of taxation to fund planning enforcement.

39.c. How should the fee be set? :

- We do not agree that a fee should be set.

40 Do you think there should be a fee payable for the discharge of conditions?

No

Please provide reasons for your answer:

- Our members are of the view that there should not be a fee payable. However, if discharge of conditions were to be subject to a fee, applicants should be entitled to receive the same service across Scotland, and we therefore consider the fee should be set by Scottish Ministers rather than local authorities.

41 Do you think that Planning Authorities should be able to charge for the drafting of planning agreements?

No

Please give reasons for your answer:

- It is not necessary for local authorities to draft planning agreements. This is something applicants can and regularly do.
- Our members have serious concerns about allowing planning authorities to charge for the drafting of planning agreements.
- The costs charged by authorities vary significantly, with many authorities insisting applicants enter into uncapped costs undertakings or face refusal of their applications. Applicants have no meaningful oversight or control over these costs. The position is particularly acute where local authorities instruct external solicitors who charge commercial rates agreed with the Council, but over which the applicant has no control.

If so how should this be calculated?:

42 Should an authority be able to charge for development within a MCA (building, or changes or use) in order to recoup the costs involved in setting one up?

Not Answered

Not Answered

Please provide reasons for your answer.:

This would depend on the level of investment in the area.

43 Should the ability to offer and charge for an enhanced project managed service be introduced?

Not Answered

Please provide reasons for your answer.:

- In previous years the notion of pre-application or 'premium' service charges has had a negative response from our members. It has been suggested on occasion by some of our members that they might be content to pay for such a service at a modest level, but they do have strong concerns that there would be no actual tangible improvement in service.
- There is concern about the sanctity of advice that will be received under a potential 'premium' service. Members have noted experience of advice given by local authorities changing following subsequent internal discussion, and on some occasions, a difference of opinion over what was actually agreed at a pre-application meeting. The local authority would have to be clear and upfront when issuing advice that was chargeable because the service expectations of applicants will certainly increase as a result of being asked to pay for advice.
- The 'premium' service must be able to demonstrate that it will add value to the planning application service (for applicants) and therefore contribute positively to delivering sustainable development and the improvement of the efficiency of the planning service.
- Members are firmly of the view that what differentiates 'premium service' developments from ordinary major developments must be clear. They are firmly of the view that applicants should be receiving a good service now and have some concerns that if basic fees increase to provide a better service and applicants pay for an 'enhanced service' they would in effect be paying twice.
- Our members are clear that any increase in fees must be hypothecated and invested in the planning system.
- A key risk is that there would be a poor service for non-payment of the premium. 'Speedy boarding' is a perceived example of this approach from outwith the industry. Some members have suggested that a refund of the enhanced payment should be given to the applicant if not an enhanced service has not been given. They are further of the view that in these cases the fee should be assessed as 75% of basic fee.
- Speed and quality of decision making are both vital elements of the planning service in relation to certainty of timescales, however, paying for project management is also not just about a quick decision. The quality of decision making is critical.
- Planning authorities would rely on the key agencies for improving their performance and this will have to be factored in with planning authorities being responsible for ensuring this as project managers. It will also be necessary for the key agencies to perform at the 'enhanced level' despite being overstretched and not receive additional funds.
- Development Consent Orders elsewhere in the UK for large infrastructure projects has been suggested as a potential approach. However, the general view is that the process is rigid and is delivered by Planning Inspectorate (PINS). A Scottish equivalent would therefore need to be considered.
- Some members suggested that a specialist team, or a central pool of specialist support could be created, but applications would then be decentralised and returned to local planning committees for decision.
- Members have also suggested the use of external resources where required, which could be a good source of pan local authority knowledge.

43.a. What, if anything, should happen in the event of failure to meet timescales?:

44 Do you think charging for being added or retained on the register of interested people should be included in the list of services which Planning Authorities should be allowed to charge for?

Not Answered

Not Answered

Please provide reasons for your answer.:

45 Do you think that, in principle, fees should be charged for appeals to Planning and Environmental Appeals Division (DPEA)?

No

45.a. Should we limit the circumstances in which a fee can be charged for lodging an appeal?:

- We have serious concerns about the introduction of fees for planning appeals.
- If there was more consistency and better decision making, our members are the view that charging for appeals could be more acceptable as it would then be an exceptional case against a transparent and consistent decision by an authority.
- There are poor and often inconsistent decisions being made across the country and appeals are vital to correcting those as highlighted in the Scottish Government planning permission appeal statistics for housing developments involving 10 or more houses since January 2015 published by the Scottish

Government.

- No other jurisdiction in the UK charges for planning appeals, and the introduction of fees in Scotland may have a negative impact on development in Scotland. It also risks pricing smaller developers and individual applicants from the planning system, which would be an unfortunate consequence at odds with the aims of ensuring the planning system is inclusive (the impact of employment tribunal fees on the number of individuals taking forward claims is a recent example of how fees can prevent wrongful decisions being addressed).

- As noted in the consultation paper, appellants would require to pay two fees for one development, first for the application and then for the appeal. Whilst we understand the Scottish Ministers' statement that this is irrelevant to the principle of cost recovery, it is unfair to appellants, particularly those whose appeals are upheld. If Scottish Ministers were to introduce fees, our members are of the view that fees should be refunded in the event of a successful appeal.

- If fees were to be introduced, we would suggest the approach used by An Bord Pleanála of having flat rates for various categories is taken.

45.b. In what circumstances do you think a fee should be paid for lodging an appeal?:

- As stated above if there was more consistency and better decision making, our members are the view that charging for appeals might be more acceptable as it would then be an exceptional case against a transparent and consistent decision by an authority.

Yes

45.d. If so, should this follow the same process as is currently set out for awarding costs?:

If fees were to be introduced, Scottish Ministers may wish to consider giving Ministers/Reporters the power to require local authorities to reimburse appeal fees, and that this is an automatic requirement where an award of expenses is granted against them. The threshold for the award of expenses (that a party has acted unreasonably) is not appropriate for the refund of a planning appeal fee.

45.e. What categories of appeals should be considered for charging?:

45.f. Do you think that a fee scale should be provided in relation to appeals to Local Review Bodies and, if so, should the arrangements differ from appeals to DPEA?:

46 Do you have any suggestions as to the circumstances in which authorities could waive or reduce a planning fee?

Please explain your view.:

- Our members are concerned about the removal of the free second application submission in accordance with the Planning (Scotland) Act 2019. This is a particular concern in cases of minor points of refusal. They are firmly of the view that there should be a fair and proportionate approach in this instance. For example, applicants are unlikely to resubmit an application at a cost of circa £120,000 to deal with the minor changes proposed by elected members to an original application, which has been approved by officers. The 2019 Act allows planning authorities to charge for anything they do relating to the planning function under the affirmative procedure (s252 of the Town and Country Planning (Scotland) Act 1997). Planning authorities can decide to waive their fee and the regulations can set out when and when not to charge. Our members are firmly of the view that such fees should be classed as minor amendments that should not attract a charge in any regulatory proposals.

Not Answered

Please provide reasons for your answer:

Other Issues

47 Should the surcharge be set at 100%?

Not Answered

Please explain your view.:

If not what level should it be set at?:

Not Answered

Please provide reasons for your answer:

- We consider it inappropriate for local authorities to be given discretion to apply the proposed surcharge for retrospective applications based on "whether the authority believe that the applicant has made a genuine mistake" – that is a highly subjective test. Given the Council would be the beneficiary of any decision to impose a surcharge it risks undermining the integrity of the planning system.

48 Given the success of ePlanning, the continuing increase in its use and the savings which are made to both an applicant and authority in submitting an application electronically, do you think it is appropriate to apply an increased fee for submitting a paper application due to the additional work involved?

No

Please provide reasons for your answer:

- We do not consider it appropriate to apply an increased fee for the submission of paper applications rather than electronic applications. This will unfairly disadvantage applicants who do not have access to the necessary resources to submit applications electronically.

- There is also concern amongst our members that there is a file size limitation associated with E-Planning and many applications have to be submitted in hybrid form, i.e. paper and electronically. Until the E-Planning service improves there cannot be additional charges for paper copy submissions.

Not Answered

If so what would you consider to be an effective discount, rebate or other incentive?:

49 Do you consider there should be a single advertising fee?

Not Answered

How do you think the cost of advertising should be recovered?:

50 Do you consider that submission of an Environmental Impact Assessment (EIA) should warrant a supplementary fee in all cases?

No

Please give reasons for your answer:

- Developers are required to fund and source a plethora of assessments and reports for the planning service. These include economic impacts, retail impacts, heritage impacts, archaeological surveys, transport impacts, drainage and environmental impact assessments – this list is not exhaustive. Even relatively limited projects of a scale can cost developers £100,000s (sometimes millions) in technical analysis, all entirely at risk of a project not proceeding. These costs are part of the development management system and they should not be discounted when considering 'full cost recovery'.

If so what might an appropriate charge be? :

We do not agree that there should be a charge.

51 Do you think that applications for planning permission in principle should continue to be charged at half the standard fee?

Not Answered

Should there be a different fee for 'hybrid applications' as described here?:

52 Should the Scottish Government introduce a service charge for submitting an application through eDevelopment (ePlanning and eBuilding Standards)?

No

About you

What is your name?

Name:

Mandy Catterall

What is your email address?

Email:

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Are you responding as an individual or an organisation?

Organisation

What is your organisation?

Organisation:

Scottish Property Federation

The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:

Publish response with name

We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

Yes

Evaluation

Please help us improve our consultations by answering the questions below. (Responses to the evaluation will not be published.)

Matrix 1 - How satisfied were you with this consultation?:

Slightly dissatisfied

Please enter comments here.:

The Scottish Property Federation (SPF) is the voice for the property industry in Scotland. We include among our members: property investors, including major institutional pension and life funds; developers; landlords of commercial and residential property; and professional property consultants and advisers.

The format of the consultation makes it very challenging to gather the views of our members and offer an industry view.

Matrix 1 - How would you rate your satisfaction with using this platform (Citizen Space) to respond to this consultation?:

Slightly dissatisfied

Please enter comments here.:

Please see the comments above.