

**Consultation Title: Consultation on Raising Planning Fees**

**Date: 20/02/2017**

**To: Citizen Space**

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Scottish Land & Estates is a member organisation that uniquely represents the interests of both land managers and land-based businesses in rural Scotland. Scottish Land & Estates has members with interests in a great variety of land uses and welcomes the opportunity to respond to this consultation.

## **Q1. Do you agree with the proposed maximum fee level?**

Scottish Land & Estates broadly accepts the increase in planning fees proposed. We agree that planning authorities should be able to recover full costs for processing applications, but that this *must* be balanced by a tangible improvement in the planning service in terms of efficiency and consistency. A clear link between increased fees and increased performance must be seen. If there is no demonstrable improvement in the planning service, then increasing the fees could end up being obstructive to delivery – something which contradicts both the planning review and the Scottish Government's aim to build 50,000 houses over the course of this parliament.

In order to ensure this outcome, we would support ring-fencing of funds accrued from increased planning fees to be recycled into processing and assessing planning applications. Any increase in fees must be balanced with a recognition that applicants are already being asked by some planning authorities to finance elements of the planning system through additional charges, such as for pre-application advice, S75 legal fees and certifying flood risk assessments. If planning fees are to be increased these additional charges cannot continue to be levied.

Scottish Land & Estates agrees that the fee maxima for small residential, non-residential and plant and machinery development should stay the same. These are often the type of developments that are critical to our rural communities and we feel it would therefore not be prudent to raise these further. We welcome the lower incremental increase thereafter which

will allow for greater flexibility on numbers/size of developments which only just exceed the small or medium threshold.

Scottish Land & Estates welcomes the recognition that there are specific challenges faced by the agriculture and aquaculture sectors and we therefore welcome the decision not to propose an increase in the fee maxima for these categories of development.

We do have concerns that the fee raise might encourage a surge in applications, including speculative applications, before the fee increase which could overload planning authorities. Consideration should therefore be given to a phased introduction to the higher fees. This would assist in easing the volume of applications being rushed through before the fee increase comes into force and Local Authorities will benefit from the increased revenue over time.