We object to the proposed increases. However, our objection is not to the principle of increasing fees or to the specific increases proposed, but to the lack of accompanying safeguards to ensure that applicants receive demonstrable benefit in return for paying more for this service.

In particular:-

1. No mechanism is proposed to ensure Councils deliver improved performance in return for the higher fees.

2. No ring fencing of planning fees is proposed to ensure the additional monies raised are used to allow much needed investment in Councils' planning teams.

3. Councils should be required to produce and publish Action Plans/Programmes to show how they will deliver improved performance for the extra fees. Until this

is done, they should not be allowed to charge the enhanced fees.

In addition:-

4. The fee should be payable in stages, with some of it only payable once a planning decision has been formally issued.

5. The concurrent Scottish Government consultation on potential changes to the planning system as a whole (ends 04/05/17) includes several potential means to

apply further charges for planning (pre-application meetings, appeals etc.). The increases proposed in the fees consultation should not be implemented until the

broader consultation is completed and the Government is able to place the level of planning fees in the context of any other charges it may decide to allow and

the total amount which applicants might have to pay in seeking the granting of planning permission.

6. Regarding this latter point (i.e. potential total costs), we would point out that the Scottish Government relies on developers and investors to deliver the

development strategy set out at high level in the Nation