



Homes for Scotland (HFS) welcomes the opportunity to provide additional input into the Competition and Markets Authority (CMA) housebuilding market study in a Scottish context in respect of the two working papers issued on 15 November 2023 relating to:

1. The analysis of the GB planning system and
2. Identifying local areas with high concentration.

This supplements information already provided by HFS to the CMA in March 2023 and September 2023. It focuses on the recommendations and options detailed within the working papers, and provides additional information and evidence relating to the questions being asked.

General points of clarification

The CMA is investigating the 'top 11' housebuilders. From this list, the following do not build homes nor hold land in Scotland: Berkeley, Redrow, Vistry, Bloor and Crest. This leaves six builders listed that operate in Scotland, these being Barratt, Persimmon, Bellway, Taylor Wimpey, Cala and Miller. In addition, the CMA should be aware that there are c310 small and medium home builders (SMEs¹) currently operating in Scotland alongside a substantial number of Scottish-only mid-size regional home builders.

In considering the 'GB planning system', the CMA needs to bear in mind the unique differences in the Scottish system when compared to the rest of GB. Many of these are highlighted in the responses to the planning working paper (1) questions below. We strongly believe that the current Scottish planning system has become too protracted, overly complex, lengthy and costly with increasing uncertainty which results in it being a fundamental inhibitor to the delivery of new homes across Scotland.

In terms of working paper (2) identifying local areas with high concentration, HFS's comments focus on general matters rather than site specific issues as these will be provided directly by the identified home builders to the CMA.

For ease, we use the same questioning system as in the CMA working papers.

¹ These SMEs are defined as builders delivering between 3 and 49 homes/ year.



Working Paper 1

Analysis of the GB planning system

Question 4.1

1. *Do you agree that planning risk is a key issue for the planning system?*

Yes, planning risk is a key risk for the home building sector which needs to navigate the process. There are multiple factors and stakeholders involved in the planning process and the lack of clarity and consistency, as well as increased politicisation in decision-making, increases this risk. There are few other statutory processes that have an indeterminate end date in terms of decision-making. Complexity of conditions, legal agreement requirements and timescales for execution can add to timescale, cost and associated risk.

2. *Do you agree with our analysis of the causes of the uncertainty in the planning system and how they contribute to under delivery of housing?*

Yes. The Scottish planning system is lengthy, complex with high associated costs including statutory pre-application advice (minimum requirement of 12 weeks), planning applications and local plan submissions. Planning application fees are continually increasing (having doubled in the last decade). Under the present Scottish Government and Convention of Scottish Local Authorities (COSLA) local government settlement agreement, these fees cannot currently be retained and ringfenced within Scottish council planning departments. The Royal Town Planning Institute (RTPI) Scottish briefing research paper 'Funding the Planning Service 2021' cites that nearly a third of planning department staff have been cut since 2009, planning authorities' budgets have diminished in real terms by 42% since 2009 and in 2020 local authorities (according to the Scottish Government Local Government Finance Statistics 2019-2020) only spent 0.38% of total net revenue budgets in local authorities were spent on development management and development planning.

<https://www.rtpi.org.uk/research/2021/november/funding-the-planning-service-2021/>.

There is a lack of predictability for adequate periods of time) and increasing instability in the policy framework in the planning system. Decision-making can lack certainty and consistency which can reduce the willingness of developers to bring forward planning applications. Allocated sites have been subject to refusal by elected members often against officer recommendation and often based on (representations from groups lobbying against new housing development at the application stage with permission later secured on appeal). Whilst there are no consequences for local authorities for such decision making, this results in increased and unnecessary cost (expense and time), uncertainty and for the developer, local authority and the Directorate of Planning and Environmental Appeals (DPEA) delays to the delivery of new homes.



The Scottish planning system lacks consistency between local planning authorities and Scottish Government nationally within its objectives and targets (there are no all-tenure housing targets, only an affordable target), resulting in local planning authorities being insufficiently focused on meeting all housing need.

The implementation of the Planning (Scotland) Act 2019 has resulted (according to the RTPI's 2021 research paper referred to above) in 91 new and unfunded duties on local authority planning departments which they estimate could cost between £12.1m and £59.1m over the next 10 years. Significant delay lies ahead in preparing and adopting the new 10-year local development plans in Scotland which have been introduced under the new Act, together with a plethora of Scottish government guidance to accompany them.

3. Are there any other factors that we should consider?

In Scotland, applicants have a statutory requirement to undertake a minimum 12-week pre-application consultation process with local communities, stakeholders and other bodies as directed by the local planning authority. This usually results in a minimum of two rounds of public engagement (in person) and often leads to consultation 'fatigue' and confusion with the public; particularly if this has followed a lengthy series of local plan preparation consultations.

The absence of primary research in assessing housing need at the local authority and housing market area level is a significant factor in the variance in output. There is a lack of transparency and ability for deliverers of housing to contribute to the housing need and demand assessments produced by each local authority (HNDAs).

HFS and member companies have just completed a significant piece of primary research across Scotland to assess true all-tenure need by way of a nationwide household survey. The data will be separated into council areas and will form a key basis for moving forward with evidence gathering under the new, emerging LDP process across the country. The final data will be available shortly and will be shared with the CMA, Scottish Government, and all other relevant stakeholders. This will provide an important primary evidence base moving forward which is currently missing from the HNDAs process throughout Scotland.

Housing land audits (HLAs) are the only tool used by local authorities to assess the level of effective housing land in each local authority. These audits are to be issued annually but are often late with information that is up to 12 months old and often have potential sites disputed between the industry and local authority.

Strategic planning in Scotland has been abolished under the 2019 Act. This absence negates the opportunity to distribute unmet housing need to neighbouring authorities (which may be in the same housing market areas) as well as identifying strategic areas of growth to meet the



wider and long-term need. Housing growth and delivery is not identified as a key national Government objective.

4. Do you consider there to be any significant difference in the level of planning uncertainty between England, Scotland, and Wales

The different approach to community-based plans between Scotland and England (i.e., Local Place Plans (LPPs) and Neighbourhood Plans (NPs)) and their different status and relationship to the development plan is a significant inconsistency in the operation of systems across GB. Inevitably, this variance can cause strategic risk in businesses operating cross-border and leads to cost differentials between countries when managing this risk.

The absence in Scotland of a presumption in favour of sustainable development, coupled with the removal of housing shortfalls when assessing housing land supply (following the demise of Scottish Planning Policy (SPP) and replacement with NPF4), is a material change which will have a significantly detrimental impact on delivering more homes particularly in the next 5 years, until the new style (10 year rather than 5 year) LDPs are prepared, consulted on and adopted. England's system can respond to shortages in land supply. NPPF allows planning applications to be approved where there is less than a 5 year effective land supply. This opportunity is no longer available in Scotland.

There is no ambitious statutory housing requirement in Scotland, only the Minimum All Tenure Housing Land Requirement (MATHLR) which, although is meant to be a minimum, is being seen by many councils as the figure they will aim to meet and no more.

Question 4.2

1. Do you agree that the current level of planning, policy and regulatory costs could threaten the viability of development at some sites? To what extent do you think that this is currently happening? Are some sites and areas more at risk than others?

Yes, a combination of additional policy requirements and increasing costs (including promotion costs to take site opportunities through the plan-led system, increased planning application fees and the increasingly regulatory environment now being encompassed with the planning system, to include net zero transition in increased energy supply/ build costs, meeting EV charging requirements etc) will mean that many sites outwith the main core primary market areas (secondary, tertiary and rural areas) will be more likely to become financially unviable. This will impact SME home builders disproportionately. Tight, small urban sites and rural sites are particularly at risk.

If Scotland pursues a brownfield only strategy, the costs of remediating / funding up-front infrastructure on such sites will result in output dropping significantly. A brownfield first policy is extremely challenging in weaker market areas unless there are significant assisted funding



interventions. There is a lack of local authority expertise in assessing and understanding development viability (especially when there is a low demand area, high abnormal costs and high s.75 planning obligations).

2. Do you agree with our analysis that shows the length and complexity of the planning system may contribute to under delivery of housing?

Yes, even for allocated sites the timescales for delivery are excessive, lengthy and uncertain.

In 2019/20, there were 116 major (defined as over 50 homes) housing applications with the average determination period being 37.5 weeks (against a statutory 16 weeks). In 2022/23, there were 56 major housing applications with the determination period being 39.5 weeks, half the number of applications and the determination period goes up despite two increases in application fees in the intervening period. The number of major applications continues to fall.

3. Do you agree that we have identified the key causes of delays in the planning system? Are there any other factors that we should consider?

Yes, the key causes have been identified. Consideration should be given to the latest Scottish Government statistics and the inability to meet statutory timescales for major development applications by a considerable margin. Cost-cutting enforced on local authorities has resulted in a significant loss of manpower, skills and experience (leadership) from the planning industry as a whole, particularly the public sector, where early retirement is widespread. There is also a lack of political will and leadership to implement a longer-term housing strategy to meet demand across all sectors of the housing market.

The significant changes (including the increased planning application requirements) introduced by the 2019 Act in Scotland and, in particular, the uncertainty of NPF4 policy, coupled with delayed Scottish Government guidance on its implementation and transition of old and new LDPs, coupled with resource challenges across the wider public planning service and the inability to reinvest planning fees into it has now reached a level that some SMEs cannot deliver homes due to the high cost barrier of entry/ risk.

4. Do you consider there to be any significant difference between England, Scotland, and Wales in: i) the extent to which planning policies and costs threaten the viability at some sites; and ii) the causes and extent of planning delays and their impact on delivery of housing?

Removing the shortfall argument in Scotland makes quickly delivering more homes difficult. Some local authorities have out of date LDPs and no new LDPs will be in place for some considerable time (the Scottish Government advises 2027/8 at the earliest). In the interim period, there is a policy vacuum when the delivery of new homes will fall. All councils will be bringing forward their new LDPs around the same time which will put pressure on public



services and stakeholders inputting into that process as well as developers and associated consultant teams who will need to submit, at high cost, more upfront technical data.

There is no statutory pre-application process in England. In Scotland, this extends the timescale for determining applications and relates to all major applications - even those sites that are allocated. No penalty (i.e., reduction in weight) exists if plans do not come forward by 2028 or they allocate insufficient deliverable land.

The NPF4 policy interpretation transition is creating inertia in the delivery system of new sites given the lag arising in LDP reviews and the impact of new policy interpretation on development management processes, particularly pending Scottish Government publishing supporting guidance around bio-diversity net gain measures, whole life carbon assessment metrics etc.

Question 4.3

1. Do you agree with our analysis that in some cases local targets may not accurately reflect underlying housing need and the reasons for this? What impact do you consider this has on housing delivery?

In the Scottish context, the under-reporting of housing need through the HNDA process has had the effect of suppressing required housing land supply provisions across many, if not all, council areas, particularly in prime market locations, for a considerable length of time. This has, in part, led to the recent announcement by a number of local authorities (Argyll & Bute, City of Edinburgh and Glasgow City Council) of a formal Housing Emergency. The concept that backlog need can be eradicated and ignored is a deeply flawed position to take.

HFS and member companies have just completed a significant piece of primary research across Scotland to assess true all-tenure need by way of a nationwide household survey. The data will be separated into council areas and will form a key basis for moving forward with evidence gathering under the new, emerging LDP process across the country. The final data will be available shortly and will be shared with the CMA, Scottish Government, and all other relevant stakeholders.

2. Do you agree that the planning system lacks internal consistency within its objectives, meaning that LPAs may be insufficiently focused on meeting housing need?

Yes, there are no clear incentives or sanctions to meeting or failing to meet housing need in full. This applies across Scotland, especially in the more affluent areas. Each local authority has individual leeway to not meet need e.g., environmental designations – no weighting towards to new homes. There is no requirement for neighbouring authorities to work together to deliver new homes nor for emerging LDPs to be in place on time and for them to allocate a sufficient choice and range of sites to meet all tenure needs. The planning system seems to



be covering an increasing number of building standards matters (e.g., building fabric, energy efficiency etc) and needs to be re-focused.

3. Are there any other issues relating to targets, incentives of planning constraints that we should consider?

Yes. Scotland should adopt annual national and local targets for all-tenure housing completions. 5 year HLS and out of date plans should remain extant until new LDPs are adopted to avoid the policy vacuum that is developing. Targets must be ambitious and influenced by up-to-date primary research.

Green belt reviews must be undertaken as part of all forthcoming LDP preparation – not just rolled forward.

A housing release mechanism is essential when housing targets are not met.

4. Do you consider there to be any significant differences between England, Scotland, and Wales in either how targets are set, the balance of incentives faced by LPAs and the extent of local planning constraints? If so, how do you think they impact housing delivery?

Housing delivery in Scotland will suffer because of the removal of the presumption, 5-year supply and release of land in the event of a shortfall. 10-year LDPs with no release mechanism offer no flexibility for delivering more homes.

There are no ‘incentives’ in Scottish council planning services for good performance, meeting timescales in determining applications nor completing new homes.

Question 4.4

1. Do you agree with our analysis of how the planning system may be having a disproportionate impact on SME housebuilders?

Yes, substantial number of SMEs left the market during the last recession and did not return. Research we are currently undertaking suggests that there has been a more than halving of the number of SMEs operational in Scotland from circa 780 in 2007/08 to circa 300 in 2023.

2. Do you agree that we have identified the key issues faced by SMEs due to the planning system?

Yes, the core issues are identified. The planning issues in the papers impact all businesses but are generally more significant for SMEs. Delays in any part of the system have substantially more financial and resource implications for SMES, resulting in a slowdown in delivery and fewer homes being delivered. This is often even more exacerbated in more rural locations.

The link below will take you to the 2019 HFS Small Scale Home Builders report which outlines in more detail the position of SMEs and suggested solutions to addressing their specific needs



[1-HFS-SMALL-SCALE-BUILDERS-REPORT-2019_DIGITAL-1.pdf \(homesforscotland.com\)](#)

3. Do you consider that the current planning system is incentivised to deliver housing on larger sites? If so, what are the implications of this for the housing delivery?

A mix of site sizes is required within the emerging LDPs to ensure a sufficient supply (range and choice) of housing is provided in all areas. There has been a shift towards the allocation of larger master planned sites, particularly in central Scotland where significant and related s.75 infrastructure is provided (including new schools and facilities for the developing communities). Developer involvement in these sites is typically larger developers. SMEs are restricted in terms of buyer power and economies of scale available to the larger developers. Combined with spiralling planning costs and technical documentation, we are concerned that the number of active SME planning applications will continue to decline.

Brownfield sites within urban areas tend to be of smaller scale, tighter sites with competing LDP policies (daylighting/ overlooking/ demolition v retention etc).

Larger sites tend to take longer to secure through planning, due to infrastructure and complex s.75 agreements but tend to be more viable and give more certainty of land supply for a business.

There is no similar organisation to Homes England in Scotland to offer incentives, nor any New Homes Bonus payments to local authorities.

4. Are there any other aspects of the planning system that have an impact on SME housebuilders that we should consider?

The potential impact of LPPs on future site allocations in Scotland is still to be established. It is likely that any impact on proposed housing sites will be related to smaller sites put forward by SME home builders, rather than larger sites.

The design and energy transition policy demands driven through planning policy will have a disproportionately higher cost for SMEs within their funding facilities and could restrict their access to growth as costs per unit increase year-on-year to meet these increasing requirements. The ever-increasing level of technical expertise required to meet consenting regimes also places additional cost pressures on operational overhead to manage an increasingly complex system pre-delivery. These costs are more difficult for SMEs to manage.

5. Do you consider there to be any difference between how the planning system impacts SMEs between England, Scotland, and Wales? Options for reforming the planning system (Section 5)

Individual SMEs working cross-border will respond directly to CMA on this question.

Question 5.1



1. Should the UK, Scottish and Welsh governments be considering changes to their various existing methods of assessing housing requirements? If so, should providing certainty, stability, and consistency to the housebuilding market feature?

Yes, a major weakness in the system (applicable across GB) is the regular absence of up-to-date primary evidence in the form of household surveys which need to be undertaken to establish the true level of housing need across the country. This used to be undertaken rigorously by councils in the 1970s and 1980s but has been lost today. The HNDA toolkit misrepresents actual housing need due to its particularly restricted definition and requires to be significantly revised by local authorities and national governments. Housing requirements should be based on objectively assessed need and demand.

2. Are the criteria we set out in paragraph 5.19 appropriate for determining an improved methodology for target setting?

Yes, these would be the key characteristics of an effective model.

3. What is the most appropriate method of forecasting housing need – nationally and locally?

In addition to the current definition of need in HNDAs covering households in temporary accommodation and those in concealed households, gross housing needs require to extend to include overcrowded households, households in unfit properties, households without and requiring adaptations, and households which state they are financially struggling.

It is essential to have reliable and up-to-date data whatever method is used, with the benefits of live 'real time' data technology being fully utilised.

Question 5.2

1. How could the financial and resourcing constraints facing LPAs in the production of local plans be mitigated whilst incentivising LPAs to produce local plans on time?

The preparation of a statutory development plan is a public service and needs to be funded by the public purse. This needs to be afforded priority in council budgeting to safeguard delivery. UK Government, as in Scotland, requires making local plan review periods a statutory duty on councils. As a statutory duty, it should not be incentivised.

The ringfencing of planning application fees needs to be introduced for the funds to remain within the planning service and assist resourcing.

Incentives, such as the New Homes Bonus could be introduced at local authority level when needs are fully met.

2. We note in Section 4 above that land supply constraints, such as urbanisation or greenbelt land, affect the availability of sites for local plans. These constraints would not be directly



changed by financial incentivisation. How could land supply constraints be managed in an effective way?

A more permissive regime is needed. Housing should be recognised as national infrastructure. Regular reviews of green belt land need to be undertaken to ensure they are fit for current purpose, refresh technical data regularly and avoid 'rolling data forward' without review. The Scottish planning system needs a safety valve when land supply falters.

Where matching need at a local level to housing land supply is constrained, an element of strategic planning could be restored to ensure the distribution of unmet need within the wider housing market to neighbouring authorities can be provided.

Question 5.3

1. What is the most appropriate method for implementing a reformed, rule-based system that is designed rigorously and resilient to future changes in planning policy -and which minimises disputes about the lawfulness of developments?

To minimise risk in development funding processes, the certainty of planning permission ought to be safeguarded. A reformed rule-based system would need to be accompanied by an appropriate level of information provided for review by the local planning authority, proportionate to the size and nature of development. Land use allocations and development standards guidelines could become the focus of public engagement, allowing permissions to be managed by professional planning officers through a greater level of delegated approval. Scotland has Masterplan Consent Areas which are still to come forward.

Question 5.4

1. To what extent would increased planning fees materially affect the viability of certain developments? Are there particular circumstances where this is likely to occur?

This requires a balanced solution to ensure SMEs are not further restricted in the housing market. Further fee increases to fund development management services within local planning authorities must be ringfenced for planning services and linked to performance of development management services.

2. How could the availability of qualified planners be improved?

In 2021, the RTP1 estimated that over the next 10 to 15 years there will be a demand for an additional 680 to 730 entrants into the sector. Incentives are required for university/ college courses to remain open for undergraduate and postgraduate students. Heriot-Watt University in Edinburgh closed its undergraduate course this year, leaving Dundee as the only undergraduate planning school in Scotland. There need to be more bursaries for postgraduate students, more apprenticeships introduced, mentoring on the job and planning needs to be



taught in secondary schools to ensure it is understood and encouraged as a profession when considered as a career.

Planning professionals in local government could be shared / collaborate and planning consultants could be employed.

Generally, there should be more positive messaging of the planning profession.

Question 5.5

1. What measure would be most effective in supporting SMEs to navigate the planning process effectively?

A number would offer meaningful support and again are outlined in detail in our previously attached Small Scale Home Builder Report.

1. Financial support from Government to reduce the levels of risk inherent in meeting the increasing costs of delivering all statutory consents.
2. Production of clear and specific guidance from the Scottish Government to mandate public agencies to focus on assisting SMEs.
3. Simplify/ shorten the existing two-layer system; from allocation of sites to detailed planning permission, ensure allocated sites are deliverable and shorten the onward planning application process.
4. Introduce a tiered structure of S75 contributions, waived completely for very small sites (less 12 homes).
5. Direct lines of engagement with the planning authority and consistency of response from officers and consultees throughout the process.
6. Staged planning application fees for SMEs.
7. Exemption on space standards for a proportion of homes on all sites to enable affordable starter homes for able-bodied buyers.
8. Ensuring that LDPs allocate a genuine range and wide choice of deliverable sites to support SME aspirations.
9. Clarity of policy which would help evaluate risk.
10. Funding availability on preferable terms which would not prohibit entry to the market.



Working Paper 2

Local concentration and land banks

In relation to the CMA's consideration of local concentrations, it should be noted that home builders and, indeed, other developers and promoters take out options to purchase land, often longer term, subject to securing planning permission. At the time, it is normally the case that the land in question would have no planning status and it is not clear how this detrimentally affects the short-term supply of land with planning permission.

Those home builders with land in the local areas of concentration identified (East Dunbartonshire, East Renfrewshire, Moray, North Ayrshire, Aberdeenshire and West Dunbartonshire) will likely provide CMA with site specific information not covered within this submission.

Question 2.1

a) Do you agree with our focus on plots as a measure of land banks? What other measures should we take into account?

Assessment by plot number is a reasonable approach, albeit there needs to be the ability to sense-check to ensure the indicated number of plots is a reasonable assumption, given the specific properties of each site. The analysis of plots in a home builder's land bank makes no distinction between tenures and so the reporting of total volumes is a crude metric and should be split by tenure to ensure a more accurate picture is portrayed, particularly when assessing build out rates as affordable units are often built out in parallel to private for sale homes.

Question 4.1

a) Do you have any comments or alternative suggestions for identifying local Housing Market Areas?

The CMA should note that some Local Housing Market Areas (LHMAs) in Scotland extend beyond more than one local planning authority area (LPA). Although using LPAs is simpler, it may not result in an accurate picture. The data should be readily available to provide accurate LHMAs, albeit the CMA model would need adjustments.

Question 4.2

a) Do you have any comments on Method 1?

Not all planning permissions may be registered on time and accurately on public registers. Speed and accuracy at registering information differs between local authorities. It is not clear whether those applications that may have secured a resolution to grant planning permission (i.e., awaiting s.75 legal agreements to be completed before planning permission is granted)



are included and are being considered as planning permissions. It is also not clear whether 'planning permission' refers to both or either planning permission in principle or full planning permission as this will affect delivery speed and output.

Output figures are swayed if a small number of planning permissions are issued over the timeframes identified. Each LHMA dynamics need to be considered to provide accurate local pictures.

b) Do you have any views as to how much weight we should put on Method 1?

Method 1 should be used in conjunction with all other land bank data information received from home builders as well as local authority obtained data. The results need to be put into local context so that an accurate picture can be understood.

Question 4.3

a) Do you have any comments on Method 2?

In method 2, it is not clear why step 3 is a measure as it is unrelated to local concentrations of home builder land banks? Applying steps 1 and 2 seems reasonable.

b) Do you have any views as to how much weight we should put on Method 2?

Individual home builders will provide feedback directly to the CMA on this.

Question 4.4

a) Do you have any other comments on our methodology for exploring land banks? What alternative or additional ways of analysing the data we have collected should we consider to shed further light on the issues?

The data sample in Scotland may be too restrictive in terms of establishing a valid argument around any land bank concentrations analysis.

When considering long term land banks, it is important to consider the date of adoption of the last LDP and the date of that previously as well as the projected date of the next one. Long term land can only be promoted at certain stages of local development preparation. Opportunities in Scotland are now limited under the terms of the new Act and some LPAs also have adopted LDPs which are very out of date.

Housing Land Audits (HLAs) are published annually by each local authority in Scotland, are publicly available and could be reviewed by the CMA as part of this study.

HFS is actively involved in almost all HLAs across Scotland, acting as an interface between members and local authorities – constructive / collaborative discussions take place in terms



of LHMA/ home builder presence, home builder aspiration, demand, availability of deliverable sites and effective supply.

Over the timeframe under consideration, each HLA provides information on any disputed sites/programming/constraints and completions for each local authority area.

Findings (section 5) Question 5.1

a) In the areas identified as potentially highly concentrated in our analysis, what are your experiences of operating in these areas? How well do you consider the market to be working, and why?

We particularly welcome views from

- Builders active in the area as to whether they consider the market is concentrated from their perspective, and how this affects their operations.*
- Smaller builders as to whether they experience difficulties in finding land in these areas.*
- LPAs as to whether they experience difficulties in identifying land for development and having this converted into housing in line with locally identified needs.*

Individual home builders will provide feedback directly to the CMA on this.

b) Are there other areas of England, Scotland or Wales which you consider to be concentrated but which have not been picked up in our analysis? If so, please provide supporting information and evidence.

Individual home builders will provide feedback directly to the CMA on this.

HFS looks forward to providing additional information to the CMA in respect of the recently completed Scottish household survey referred to in questions 4.1 (3) and 4.3 (1) above and ongoing research in to the SMEs in Scotland. In the meantime, please do not hesitate to contact us if you require any clarification on the above or wish to discuss any matters raised in more detail.