

What is your organisation or group's name?

Neilsons Solicitors and Estate Agents

Do you have any comments on the structure or clarity of the Draft Guidance?

NO

Do you have any comments on the illustrative examples of commercial practices applying the prohibitions? Are there any areas where you think additional examples could usefully be reflected in the Draft Guidance?

I think it would be useful in section 9 to have clarity around the purchase of property and what total costs should be advertised. Do we need to put illustrative examples in property adverts of LBTT or ADS charges for example? Or being able to link to an LBTT calculator if that's enough? How many clicks away can the total price be? Bearing in mind that in addition to the purchase price of the property, a buyer will also need to pay their own legal fees and VAT thereon plus any outlays which can't be calculated by the seller/selling agent.

Do you have any comments on the Draft Guidance on the 'drip pricing' provisions in the DMCC Act (found in the 'Material pricing information' section of Chapter 9 of the Draft Guidance), including the illustrative examples? In particular, are there any specific pricing practices that have not been included in the 'drip pricing' illustrative examples which you think it would be helpful to include, and if so, what should such further guidance specifically cover?

See above re sale of property. This need further specific guidance/clarity. (relating to regulation 6)

Do you have any comments on the Draft Guidance on the banned practice relating to fake consumer reviews (found in Annex B to the Draft Guidance)?

No

Do you have any other comments on topics not covered by the specific questions above? If so, the CMA requests that respondents structure their responses to separate out their views in relation to each of the Draft Guidance's chapters

No

Other information

As above, we need specific guidance relating to the sale price of property where tax is to be included in the total purchase price.
