



Scottish Chambers of Commerce Response to Barclay Implementation: A consultation on non-domestic rates reform

Introduction

Scottish Chambers of Commerce has consistently campaigned for Scotland's non-domestic rates (NDR) system to provide a fair deal for businesses. It's important that businesses contribute to civic society, but it's also critical that any tax system has fairness as a key, consistently reviewed core principle behind its operation.

Through the commission of the Barclay Review, the Scottish Government was presented with a clear opportunity to reform this system to reflect the modern economy, ensuring that businesses across all sectors contribute fairly towards society, while supporting long term economic growth.

The final recommendations provided at the conclusion of the Barclay Review were broadly welcomed by the Scottish Chambers of Commerce and our business members, although we continue to maintain that the revenue neutral constraints of the review acted to prevent a truly transformative approach to the NDR system.

Many of the recommendations, such as the move to three yearly revaluations, the expansion of fresh start relief, and the business growth accelerator, have the potential to increase economic growth, improve the inherent fairness of the system and benefit the regeneration of local high streets and businesses. SCC also welcome that the Scottish Government moved swiftly on several recommendations, implementing them shortly after the Barclay Review's publication.

Further long-term reform of the system remains necessary however. Scottish Chambers of Commerce continue to urge the Scottish Government to go beyond the recommendations of the Barclay Review, particularly with regards to the next revaluation - which must be conducted in 2021 to bring fairness to the system faster, and to prevent competitive disadvantage in comparison to other UK nations.

SCC recognise that local assessors are making steps to reform their practices, but it's crucial that they continue to go further to improve consistency of experience for businesses across Scotland. We would encourage the Scottish Assessors Association to maintain their progress in this area to ensure that proposed timelines are met.

There also remain a number of areas in which the Scottish system lacks certainty, or is disadvantaged, in comparison to the English rates system. The Scottish Government must move ahead rapidly to remove the large business supplement, which creates disparity between the Scottish and English systems, leading to a competitive disadvantage. There's also clear need for further legal certainty around our respective systems. Particularly, when it comes to issues such as Material Change of Circumstance legislation, which desperately requires further clarity in Scotland. We've seen in the past that following major events, which many lay individuals would define as a material change, the lack of legal certainty has exposed inflexibility, and left businesses disappointed by a lack of perceived equity in the system.

Nevertheless, this consultation presents an opportunity for the Scottish Government to progress reasonable reforms in the Non-domestic rates system, and Scottish Chambers of Commerce welcomes the invitation to respond.

CONSULTATION ON BARCLAY IMPLEMENTATION

Barclay recommendation 1

A Business Growth Accelerator - to boost business growth, a 12-month delay should be introduced before rates are increased when an existing property is expanded or improved and also before rates apply to a new build property.

Question 1 - What are your views on how the growth accelerator and new unoccupied build should be treated in legislation?

SCC would suggest that secondary legislation has currently been adequately achieving the aims of the growth accelerator. As a core point, SCC would object to the introduction of a flexible time delay through regulations, as proposed in point 16 in the consultation document.

The crux of this recommendation, as introduced by Barclay (with no reference to time delay flexibility, only the current 12-month period) was to encourage firms to invest in property improvements. The Scottish Government has recognised, through the investment targets highlighted in the 2018-19 Programme for Government, the challenging track record which exists around investment overall in Scotland.

This recommendation acts as one way to support investment in the economy by giving firms flexibility to invest and recoup the partial costs of investment across the 12-month period. As per the Barclay Review:

“This recommendation is intended to encourage owners/ tenants to improve their existing premises, invest in plant and machinery and to encourage the construction of new build premises thereby increasing economic growth, increase the tax base over time and raise more future revenue.”

The core principle of this recommendation is for the Scottish Government to forgo immediate revenue, with the benefit of increases in revenue in future periods due to the increased investment and subsequent impact on rateable values that this will have. 12 months should sit as a minimum period for this, and any future legislation, if progressed, should either enshrine this as a minimum period or retain the fixed 12-month limit, to ensure fairness and certainty for businesses.

Barclay recommendation 2

There should be three yearly revaluations from 2022 with valuations based on market conditions on a date one year prior (the 'Tone date').

Question 2 - Do you have any comments on three yearly revaluations?

Scottish Chambers of Commerce accept the three yearly valuation cycle outlined by Barclay, and welcome the move to more frequent revaluations. However, following the publication of the Barclay Review, the rest of the UK is now set to have comparative revaluations earlier, setting Scotland and Scottish firms at a disadvantage, as firms in disproportionately affected geographies and sectors continue to pay rates which do not reflect market conditions.

SCC therefore suggest that, in line with the announcement's made post-Barclay by the UK and Welsh Governments, the Scottish Government should be more ambitious, and look to conduct the next revaluation in 2021, with a 2020 tone date.

The reasoning given by Mark Drakeford, Cabinet Secretary for Finance in the Welsh Government, outlines the rationale for this - ensuring that rates reflect up-to-date market conditions:

"The next non-domestic rates revaluation in Wales will take place in 2021, in line with the next revaluation in England.

Bringing the revaluation forward by a year from 2022 will mean the rateable values on which non-domestic rates bills are based will reflect up-to-date market conditions and enable ratepayers in Wales to plan ahead."

Taxation systems have to allow for certainty and practicality for the government of the day, but above all, they must be fair to those upon who they are applied to. The current NDR system in Scotland has locked ratepayers into challenging arrangements, reflected through the range of transitional reliefs, both sectoral and geographical, which have had to be applied in order to mitigate values which no longer reflect circumstances.

Furthermore, despite the laudable efforts of the Scottish Government to respond by bringing in these reliefs, the application-based process can mean that firms may neglect to claim relief, if it has not been adequately brought to their attention.

The Barclay Review made a number of references to parity and alignment between Scotland and the rest of the UK throughout, and at the time of writing, the panel would not have been aware of the subsequent changes in position of the UK and Welsh Governments.

The fairest way to proceed therefore, is to bring forward the revaluation to 2021, and ensure that businesses across the country are provided with values which reflect market conditions as they stand.

Barclay recommendation 5 b)

A new power to enable councils to impose an additional levy on rates in certain circumstances.

Question 3 - From 2020 a small number of pilot councils will have a new power to increase rates paid by out of town or predominantly online businesses.

a) Do you agree or disagree with putting in place safeguards?

SCC would urge the Scottish Government to consider carefully whether additional levies processed through the NDR system is the most appropriate path to address this perceived imbalance, and the right way to fund expanded fresh start relief.

There's a core assumption at the heart of this levy, which is that the NDR system is not fit for purpose in terms of reflecting current market / economic conditions. In Annex A of the report, The Barclay Review reflected that a property tax was the most appropriate model, and that refinements of the existing system were most appropriate. SCC would argue that shifting to industry specific levies as a way to balance revenue is a substantive change to the existing system, further increasing complexity. If the NDR system is working as intended (and more frequent revaluations will assist in this), warehousing space as an example, should become significantly more valuable. If indeed these businesses are outperforming the market at large, this should be reflecting in increasing rents over time, and therefore increased NDR revenue from these properties.

As per earlier recommendations, SCC would highlight that a more ambitious, UK-aligned timetable for the revaluation could act as one way to address this balance faster.

If the pilots are to proceed, then it is critical that a significantly clearer definition is provided above "out-of-town or predominantly online", which could capture a wide array of businesses. In 2016, John Lewis online sales were estimated at 40%, and the business has observed substantive online sales growth across the past few years. This definition seems to be challenging and fails to take into account the fact that high street businesses, as well as out of town firms, will be equally investing in their online capabilities as consumers shift towards these channels. As a further example, if a high street takeaway store received the vast majority of orders through an online app,

would this also potentially fall into a “predominantly online” business? Hotels sit as another business type which would also appear likely to meet this definition, acquiring sales through digital channels.

Furthermore, although this is a Barclay recommendation, it seems to fall outside the reasoning and logic behind some of the other points in the review, particularly in Annex C, for example:

C.2 We are all aware that consumer habits are changing and many businesses now offer a mix of online and physical services. Many are based only online and for those a property tax is neither efficient nor appropriate and we were bound within our remit to look only at the rating system.

Simultaneously, the Barclay Review suggests that out-of-town or online business should be subject to some type of additional property levy, while also suggesting that NDR is not appropriate as a means to capture revenue from online businesses.

Annex C in the Barclay Review also states:

C.5 We are of the opinion that adapting non-domestic rates as a tool to ensure that the digital economy makes a fair contribution to local services would be inefficient. Attempting to crowbar a property tax upon some businesses that do not rely on property is not only counter-intuitive, but will also likely lead to significant unintended consequences.

Again, this seems to stand in opposition to the recommendation itself. Supporting high streets and ensuring that town centres continue to be prosperous is a laudable aim, and SCC is fully supportive of this, but fundamentally, this scheme seems unlikely to address the structural challenges facing high street firms, while unfairly punishing those who have opted for specific business models. Many firms have opted to base out of town not only due to the lower headline costs, but through the encouragement of the planning system and other incentives over the years.

This also reinforces the issue of structural fairness in the system. There is no inherent fairness in an independent out of town warehousing business acting to subsidise an independent high street retailer with similar margins and turnover, simply due to geographic location. The contrast with localised / sectoral reliefs in comparison to this levy proposal, is that an evidence base, through engagement with industry and membership organisations, defined these challenges. There appears to be no similar analysis to contend that the average out-of-town, or online business, is in a position which is substantially more favourable than their high street counterparts.

Given the potential issues outlined above, it is clear that safeguards should be an integral part of any scheme, if these are to go ahead.

b) Please explain your response to (a) including what the safeguards should be if you agree they are required.

At a basic level, aside from the safeguards outlined in the consultation, there should be a stronger emphasis on safeguard D - linking any revenue specifically to the use specified by Barclay in this recommendation, or alternatively, broader use of the community empowerment act to provide localised rate relief. Few councils have made use of the community empowerment act to create localised reliefs.

There must be an iron-clad, legislative link between the revenues raised via any levy and an assurance that it will only be used for the specific reliefs linked to this recommendation in the Barclay Review, primarily the expansion of Fresh Start relief.

A specified, statutory limit to the levy should also be defined within this pilot. This cap should also consider the potential existence of a Business Improvement District and the operation of a BID levy in any pilot area.

Finally, these pilots must also run to strictly defined timescales, to prevent firms subject to the levy in the pilot areas from being disadvantaged for any significant length of time.

Question 4 - Do you have any comments on the criteria and process which should be used to assess the pilot scheme(s)?

Business survival rates, both within the high street and out-of-town as an ultimate measure.

The scheme should be subject to an independent evaluation on a range of criteria, which should aim to demonstrate whether there is a clear causal link between the relief itself and high street business survivability in the pilot areas. This should include a comparison between other similar local authority areas where such reliefs have not been applied.

Such an evaluation should also examine perceptual fairness in the system, and should include pre and post implementation measures of trust and fairness in the NDR system, to gauge how the levy impacts business trust and perception in the pilot areas.

Barclay recommendation 13

The current criminal penalty for non-provision of information to Assessors should become a civil penalty and Assessors should be able to collect information from a wider range of bodies.

Question 5 - What level(s) should this civil penalty be set at?

No comment.

Question 6 - How should the penalty be set? Should it be a fixed penalty or proportionate to/ banded by rateable value?

While SCC have no comment on the level of civil penalty, it seems appropriate that this should be a small fixed penalty - information requested may not always be directly proportionate or related to the rateable value of the property.

Question 7 - Do you have any views on who is responsible for administering the penalty and the process for appeals against the penalty notice?

This should be managed, administered and reviewed by an independent body to ensure transparency and fairness for businesses.

Question 8 - Which organisations/ individuals should be required to supply necessary information to the Assessors, where applicable?

SCC would argue that, as with all data / information, this must be obtained from primary sources (i.e. the individual / organisation / proprietor legally responsible for the subject(s) in question). Collecting data from secondary sources could lead to additional error. Furthermore, given the Barclay Review's focus on transparency, collecting data direct, and further strengthening the link between ratepayer and the local assessor, stands as an appropriate means to work towards this aim.

Furthermore, although civil penalties are an accepted feature of our legal system, any process which sees the introductions of new civil penalties should also consider the current means by which assessors are collecting information from relevant parties. Incentives, through well designed, easily understood information collection systems and processes, are likely to be just as effective as introducing additional penalties.

Linked to this, there is a reasonable assumption that appeals will be reduced as information provided to assessors is more accurate. In order for this to actually be seen in practice however, it would follow that there needs to be a clearer process by which this information is passed to Assessors and clearly actioned. If the valuation process continues as a relatively opaque process, then this link is unlikely to be created, and the effect on overall appeals levels will be minimal.

Scottish Chambers of Commerce would continue to urge the Scottish Government to work in partnership with the SAA to ensure that assessors make progress on delivery of the appropriate recommendation in the [SAA action plan](#) which makes this goal possible - mainly providing information on the supporting evidence used to support valuations - particularly comparator bodies.

Revisiting the core principle of fairness, and the actual aim of this recommendation, SCC would argue that the resource put towards the creation of new appeals bodies and civil penalties should be equally matched by a focus to provide businesses with adequate oversight and information on their own rateable values, an objective we believe would be far more likely to reduce appeal counts in the longer term.

Barclay recommendation 16

A new civil penalty for non-provision of information to Councils by ratepayers should be created.

Question 9 - What level(s) should this penalty be set at?

No comment.

Question 10 - How should the penalty be set? Should it be a fixed penalty or proportionate to / banded by rateable value?

While SCC have no comment on the level of civil penalty, it seems appropriate that this should be a small fixed penalty - information requested may not always be directly proportionate or related to the rateable value of the property.

Question 11 - Do you have any views on who is responsible for administering the penalty and the process for appeals against any penalty notice?

This should be managed, administered and reviewed by an independent body to ensure transparency and fairness for businesses.

Question 12 - Should this be a mandatory penalty or one that the Council has discretion over (please indicate your preference and add any comments)?

Any penalty system should have appropriate discretion built in as a matter of course. As an example, while the 28-day period may be appropriate for certain routine notifications, when it comes to matters such as relief evidence, there may be more involved processes required to gather this evidence.

This could have the effect of making it more difficult for smaller businesses to access reliefs, biased the system towards firms that have the resource necessary to pursue them in the constrained timeframes.

Therefore, the local authority, or ideally an independent monitoring body, should be able to revoke penalty notices where suitable evidence is provided to demonstrate extenuating circumstances, or failure to follow appropriate process from a local authority perspective.

Barclay recommendation 18

Councils should be able to initiate debt recovery at an earlier stage.

Question 13 - How should the debt recovery changes be communicated to ratepayers?

Any changes to the way ratepayers will experience the system should be appropriately communicated via digital and print media campaigns. Chambers of Commerce and other business membership organisations should be able to support in these efforts, but councils should ensure adequate resource is available to communicate these crucial changes to ratepayers.

Any communication effort should also clearly specify how local authorities will be acting to repay overpayments, and form part of the broader commitment to provide improved ratepayer information to businesses.

Question 14 - What are your views on whether Councils should retain a discretion over debt recovery to allow for any extenuating circumstances?

Extenuating circumstances should be a feature of any fair taxation system - especially at times of change.

Barclay recommendation 19

Reform of the appeals system is needed to modernise the approach, reduce appeal volume and ensure greater transparency and fairness.

Question 15 - How should this change be communicated to ratepayers?

Any changes to the way ratepayers will experience the system should be appropriately communicated via digital and print media campaigns. Chambers of Commerce and other business membership organisations should be able to support in these efforts.

If this change is brought into place, it's particularly crucial that firms are made aware of these changes at the point of appeal.

Question 16 - Do you have any points about the change to allow valuation appeals to increase?

While introducing risk (in the form of potentially increased RVs), will potentially have an impact on the number of appeals processed through the system, Scottish Chambers of Commerce would urge the Scottish Government to be cautious in the implementation of this change.

By creating an unspecified potential risk, rather than, for example, a flat fee for a failed appeal, the system risks being biased towards those who have the resources to take these risks. As with some of the other changes suggested in this consultation, the Scottish

Government must ensure that, in a bid to reduce administrative burden, that the system does not begin to act as a barrier to access to justice for smaller ratepayers.

Additionally, although this recommendation is billed at “providing fairness to other ratepayers” - it must be considered how this will act in the future with potential further powers for Assessors. An anomaly of the current NDR system in Scotland, is that one business can appeal, see their RV reduced, and their next-door neighbour, in an identical property, will never receive a revised value themselves - either until a revaluation or via engaging in their own independent appeal.

Businesses would argue generally that there’s an inherent unfairness in assessors being informally aware that their RV is incorrect, but not being able to correct this value without a formal approach from the ratepayer or a revaluation event. This isn’t a fault of the Assessors, but simply a constraint of their current powers, and an ongoing debate within the ratings community. Nonetheless, it’s important to highlight that there remains an imbalance towards individual businesses in terms of the information which assessors have available, and that which is publicly disclosed, concerning rateable values.

A final question that remains unanswered by this, and a concern even in light of the original aim of this recommendation, is the right to appeal on these revised values. It follows that an appellant, already frustrated by what they perceive as an incorrect value, would be more likely to pursue a further increased RV to a later stage of appeal. There’s therefore a risk that this change would increase the number of later stage appeals.

SCC would continue to argue that the most effective way to reduce appeals is to provide businesses with accurate, detailed information as to how their rateable value is derived. Adding additional risk into the system via bi-directional rateable value change may well decrease the overall number of filed appeals, but may do so at the cost of small and medium-sized businesses, who are more likely to be discouraged by the potential consequences even with strong grounds for an appeal.

Barclay recommendation 20

A General Anti-Avoidance Rule (GAAR) should be created to reduce avoidance and make it harder.

Question 17 - When the General Anti Avoidance Rule is introduced, do you have any recommendations or principles that this should encompass?

SCC would have two core recommendations concerning the GAAR:

- That, as with other taxation systems, the use of a GAAR must be as a last resort.
- That any GAAR usage, including frequency, is monitored by an independent body to ensure that the GAAR is being used fairly, and in the absence of any alternative.

Barclay recommendation 21

To counter a known avoidance tactic, the current 42 days reset period for empty property should be increased to 6 months in any Financial year.

Question 18 - How do we raise awareness of this change among ratepayers?

Any changes to the way ratepayers will experience the system should be appropriately communicated via digital and print media campaigns. Chambers of Commerce and other business membership organisations should be able to support in these efforts.

Question 19 - Do you have any further comments around the 6-month reset period for empty property relief?

Detailed analysis of the actual or expected rates of abuse around this metric would be useful to understand the estimated scale of the issue. Within the Barclay Review, the expected savings from this metric were counted under a range of recommendations, and thus it is unclear exactly what proportion is believed to link to empty property relief.

SCC remain concerned that further constrained empty property relief could lead to the demolition of properties, or the conversion of properties to types which have more limited use. Although these properties may not currently be in regular occupation, this could damage the flexibility of our industrial base if the amended reset period sparks irreversible change to the nature of these properties.

As indicated in the consultation, Barclay themselves indicate that pop-up use of empty property is not uncommon, and via their suggestion of a discontinuous period, recognise that this is a beneficial feature of the system at large. Increasing this reset period may also cause ratepayers to only lease properties to businesses which are more conventional, and potentially more likely to succeed. Landlords may be more sensitive to the perceived survival rate of businesses, and may favour more “conventional” firms in their lease decisions as the reset period increases. This could damage the ability of innovative firms to secure property and further develop their businesses.

The discontinuous period, although an appropriate means to recognise the validity of short-term / alternative property use, also creates a significant challenge for ratepayers in properties which are genuinely occupied on an intermittent basis, as these ratepayers presumably must be forced to hold until the end of the financial year, in certain cases, before they can apply for appropriate relief with valid evidence.

If this change is to go ahead, there should be some consideration to this, with an relief application process which recognises this discontinuous period and ensures that ratepayers are not penalised due to these changes.

Barclay recommendation 22

To counter a known avoidance tactic for second homes, owners or occupiers of self-catering properties must prove an intention to let for 140 days in the year and evidence of actual letting for 70 days.

Question 20 - Should there be any local discretion in the application of this policy?

It seems appropriate that local discretion should apply in this instance.

Question 21 - If your answer to question 20 is yes, under what circumstances should this discretion apply?

There's a number of circumstances which will be particularly local / situational - as detailed in point 55 of the consultation document (weather related access issues). However, more generally, the "actual let" condition is problematic and sets inequitable conditions on this portion of the hospitality sector.

Businesses across other sectors are not required to showcase, for example, a minimum level of achieved sales to qualify for SBBS. Forcing this on a genuine, growing micro-hospitality sector would be inequitable, and there must be further consideration of this in moving ahead with this recommendation. Businesses also sign an anti-fraud declaration already when applying for SBBS, so a more equitable solution to this recommendation could simply include improved fraud detection and investigation for the SBBS scheme as a whole.

The actual let issue must be covered by local discretion regardless. If, for example, a ratepayer attempts to let out a property for a festival or other large-scale event, only for this to be cancelled - it's clear that this will have major effects on their actual occupancy rates across the year. Local authorities must be sensitive to these needs and changes in the local economy which will affect actual occupancy levels.

Barclay recommendation 24

Charity relief should be reformed/restricted for a small number of recipients.

Question 22 - How should independent schools with exceptional circumstances such as specialist music schools be treated?

Fundamentally, this debate seems to drift into the scope of charitable definition / charitable status. It seems appropriate that further engagement with the sector should be carried out to further explore the impact of restricting this relief on all types of independent schools, before this recommendation is progressed.

Barclay recommendation 25

To focus relief on economically active properties, only properties in active occupation should be entitled.

Question 23 - How should active occupation be defined?

Active occupation has already proved an extremely challenging term to define, with case law in other jurisdictions illustrating the differences of opinion in this area. However, it's reasonable that empty properties only receive the relief intended for them, rather than more generous reliefs for other purposes.

It seems reasonable that, at the least, a further consultation would be necessary to understand fully the definitions of active occupation. Documentary evidence, as outlined in point 61, would be a reasonable starting point for this discussion.

What is clear however, is that floor space in particular is a completely unsuitable metric to define activity. Case law across other jurisdictions has reinforced the difficulty of this as a metric, and it does not adequately reflect the changing property use of digital services firms.

Barclay recommendation 26

To encourage bringing empty property back into economic use, relief should be reformed to restrict relief for listed buildings to a maximum of 2 years and the rates liability for property that has been empty for significant periods should be increased.

Question 24 - What are your views on whether Councils should have discretion in the application of this measure for properties, so that local circumstances can be accounted for?

It's undoubtedly the case that local discretion is required, listed buildings are local assets and the knowledge of local authorities and communities in the area should be paramount in evaluating feasibility & risk that rates application will endanger the property's long-term maintenance and future.

However, local authorities will also act fundamentally as a recipient of this relief, proportionally more so than any single private sector firm in their area. There should be some type of oversight mechanism in place to ensure that local discretion judgements are equally considered whether they apply to the private or public sectors.

Barclay recommendation 27

Sports club relief should be reviewed to ensure it supports affordable community-based facilities, rather than members clubs with significant assets which do not require relief.

Question 25 - How should affordable/ community sports facilities be defined?

Further engagement is required with the sector to define this appropriately. From a general point of principle, there are likely to be difficulties in withholding a relief from an organisation based on their stated values (as outlined as one option). These stated values may not always equate with outcomes.

Barclay recommendation 30

Commercial activity on current exempt parks and Local Authority (council) land vested in recreation should pay the same level of rates as similar activity elsewhere so as to ensure fairness.

Question 26 - How should commercial activity on parks be defined?

Separate engagement with the sector will help to define this further, but it seems appropriate for commercial activity to be defined in the same way as it would be for broader purposes - i.e. for VAT purposes, or for claiming rates relief etc - if fairness is the desired outcome.

Further engagement with affected businesses is necessary to understand the impact of suggested definitions.

Concluding Comments

The Scottish Chambers of Commerce Network is appreciative of the Scottish Government's consultative approach on non-domestic rates and welcomes the opportunity to respond to this consultation. In summary of our response, the Scottish Government should continue to focus on core principles of fairness to all businesses, and transparency as the process of reforming the NDR system continues. For SCC, this means:

1. Moving towards the three-yearly revaluation cycle at an accelerated timetable, with the next revaluation taking place in 2021, with a 2020 tone date, to align with nations across the UK. This will prevent competitive disadvantage for Scottish firms and assure a fairer business environment, faster.
2. Retaining the 12-month period as a fixed term, or alternatively as a minimum term, with regards to the Business Growth Accelerator. The NDR system must provide certainty to firms.
3. Avoiding industry specific, sectoral, or geographically based levies which fail to address broader structural challenges which are not adequately targeted by the NDR system.
4. Ensuring that changes to debt or information collection, and the introduction of associated penalties, are matched with a commitment to provide ratepayers with significantly enhanced transparency and information around their own rateable values.
5. Ensuring that reforms do not inadvertently bias the NDR system against small or medium sized businesses, or mark out any specific sectors. Allowing appeals to lead to higher valuations, or forcing micro-hospitality firms to provide a higher burden of proof for relief, can risk biasing the system towards those with more resources and the ability to take greater risks, impacting on overall fairness.

About the Scottish Chambers of Commerce Network

Scottish Chambers of Commerce (SCC) is Scotland's largest business network. SCC brings the views of the business community together, forming a clear and powerful expression of Scottish business opinion through its network of 26 accredited Chambers of Commerce, representing 11,000 members.

