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Dear Dawn

LSB Consultation - PCF Applications

Thank you for permitting us an opportunity to comment on your proposals to make minor amendments to the LSB's PCF Rules. Subject to the comment below, we believe that the amendments propose are reasonable and proportionate.

Specifically, we welcome the proposal to set out in the PCF Rules a requirement for 'clarity and transparency on the allocation of financial resources and whether or not those resources arise from permitted purposes, and the impact of the proposed practising fees' (rule 10(f) proposed rules).

We suggest that 'and other' should be inserted after 'financial' and before 'resources'. We are unclear how the LSB can have the necessary oversight if it concerns itself strictly with the financial issues when wider resourcing factors, such as staffing, are an important driver for costs. It is important that the costs of regulation and sources of funding are clear and fair, and we agree also that the regulated community is entitled to know how income and resources will be allocated. This is the approach taken by the CLC.

Although this is not part of the current consultation, the CLC has benefitted greatly from the proportionate approach taken by the LSB in the approval of its PCF applications since 2010 and would welcome confirmation from the LSB that this approach will continue unchanged.

Yours sincerely

Simon Blandy
Director of Regulatory Standards