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**Consultation: Changes to rules made under S.51 of the Legal Services Act 2007**

Dear Sirs,

On issuing this consultation paper the LSB Chief Executive publically announced *"The Legal Services Board believes in the importance of reducing regulatory costs in legal services ..... we want to see the regulatory burden reduced and at the same time we believe that this reduced burden could also potentially contribute to a reduction in costs."*

The consultation paper however, makes no mention of the intention to reduce costs, indeed it states the intention is *"to test whether the rules continue to meet the purpose for which they were intended."*

On reading the proposed changes, we can only identify an increase in regulatory burden and cost. The LSB seeks to impose a new requirement that in the event of any proposed increase to a practising certificate fee (no matter how small and not even allowing for an annual rate of inflation increase, which is not unreasonable) the approved regulator would now be required to compile three years forecasts and budgets.

Further, the LSB has not provided the evidence required to support the need for this increased regulatory burden.

Yours faithfully,

Lynn Plumbley  
(Chief Executive)

Cc: Neil Buckley, CEO of the Legal Services Board