

Response ID ANON-5AGP-WTT1-W

Submitted to Land Reform in a Net Zero Nation
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Part 4: Criteria for large-scale landholdings

1 Do you agree or disagree with the criteria proposed for classifying landholdings as 'large-scale':

question1 - a) A fixed threshold of 3,000 hectares:
Disagree

question1 - b) Land that accounts for more than a fixed percentage of a data zone (or adjacent data zones) or local authority ward(s) designated as an Accessible Rural Area or Remote Rural Area, through our six-fold urban/rural classification scheme:
Disagree

question1 - c) Land that accounts for more than a specified minimum proportion of a permanently inhabited island:
Don't know

Please give some reasons for your answers and outline any additional criteria in the text box below::

SCDC's perspective is informed by our work with community organisations across Scotland, both rural and urban, and often based in the most deprived areas of Scotland (according to the Social Index of Multiple Deprivation). For instance, our Scottish Government-funded programme, Supporting Communities helps build the skills, confidence and knowledge of community organisations across Scotland, helping them to address the issues important to them and their communities.

A key focus of Supporting Communities is disadvantage: how some community organisations face more barriers to achieving their aims than others. These could be groups that are based in areas with higher levels of poverty, or remote rural areas, or groups that represent communities who are more likely to experience discrimination.

The use, management or ownership of land and buildings is often identified as a key means to achieving these aims. Crucially, it is mostly the control of small pieces of land or buildings that make the difference to whether such communities achieve their aims. Our view is therefore that the legislation should aim to help, rather than hinder, disadvantaged communities to have more control over local land and buildings, whatever their scale.

Other organisations such as Community Land Scotland (CLS) have a stronger understanding of the detail in respect to what would work in practice, and we generally support the notion that the fixed threshold should be greatly reduced to 500 hectares. This would subject much more land and buildings to the legislation and likely help community organisations to achieve their aims as described above. It would also be a large enough threshold to remain proportional.

For the same reason, we also feel that the fixed threshold should apply to landowners with a controlling interest in individual landholdings that add up to meet the proposed threshold.

Our understanding of criteria B is limited, but we disagree with the general premise that the criteria should exclude urban areas and towns. Scotland's most disadvantaged communities tend to be urban and, if land use and ownership is, as it should be, seen as a means of addressing inequality and disadvantage, then the criteria should not exclude towns and urban areas.

On this note, we support other options for setting criteria, including the financial value of land (both urban and rural), receipt of direct agricultural subsidies and the significance of local assets to communities. This would give further scope to communities in disadvantaged urban areas (as well as other areas) to benefit from land use and ownership.

2 Do you agree or disagree that family farms should be exempt from the proposals outlined in Parts 5 to 7 even if they are classified as a 'large-scale' landholding?

Disagree

Please give some reasons for your answer in the text box below::

Whilst the exact size-criteria could vary from other categories of land owner, we think it would be proportionate for the legislation to apply to large-scale family farms.

3 Do you think that the proposals considered in this consultation should be applied to the urban context?

Yes

Please give some reasons for your answer in the text box below::

The 2015 Community Empowerment (Scotland) Act's extension of the community right to buy to urban areas signified a change in thinking about land reform. Whereas it was previously thought of as a rural development issue, it is increasingly being perceived in terms of community ownership, urban regeneration, housing and human rights. See more on this at <https://spice-spotlight.scot/2018/04/26/implementation-of-land-reform-measures/>

Urban communities are at least as likely as rural communities to seek to influence change in these areas, and many of the proposals would apply to the urban context as much as they do to the rural context. Therefore it is important the proposals are applied to an urban context.

Finally, we believe that our proposed changes to the criteria for large-scale landholdings (based on CLS's thinking) will facilitate the application of the proposals to an urban context.

Part 5: Strengthening the Land Rights and Responsibilities Statement

4 We propose that there should be a duty on large-scale landowners to comply with the Land Rights and Responsibility Statement and its associated protocols. Do you agree or disagree with this proposal?

Agree

Please give some reasons for your answer in the text box below::

As the consultation paper highlights, many landowners have not adhered to the voluntary protocols. In other related legislation, such as the Community Empowerment (Scotland) Act 2015, legal duties have been shown to at least help focus attention on the importance of community engagement, partnership, community empowerment as well as community ownership.

For instance, public bodies have informed us that duties to respond to participation requests, whilst not leading to many formal requests under the legislation, have led to their organisation taking community participation in service improvement more seriously.

5 If there was a legal duty on large-scale landowners to comply with the Land Rights and Responsibility Statement and its associated protocols, we propose that this should be enforced by having a formal procedure for raising complaints, and by making provisions for independent adjudication and enforcement.

Agree

Please give some reasons for your answer in the text box below::

SCDC has led on Scottish Government-funded work exploring the potential of creating an appeals process for participation requests. From this and our wider work on participation requests, we know there is a strong feeling from the majority of community organisations we have spoken to in our work that participation requests are 'toothless' without an independent appeals process and further oversight.

The low uptake of participation requests can be compared to the more frequent use of asset transfer requests, which are accompanied by an appeals process. It is also the case that many, if not most, participation requests, have not led to outcomes that community participation bodies have been satisfied with.

In general, we have observed that community-oriented legislation that is legally enforceable or where appeals can be made, such as equalities and human rights legislation and community asset transfer, is taken more seriously and has led to more positive outcomes than legislation which isn't, such as participation requests and the Fairer Scotland Duty.

Disagree

question5b_organisation_type - Community:

Agree

question5b_organisation_type - Charity:

Agree

question5b_organisation_type - Public sector:

Agree

Please provide some reasons for your answers and any additional suggestions in the text box below::

Restricting the reporting of breaches to constituted organisations creates an extra and unnecessary hurdle for communities, which will make it more likely that well-organised, high-capacity and well-resourced communities can benefit from the legislation.

As part 3 of the Community Empowerment (Scotland) Act has shown, it is relatively simple to create a set of criteria for community groups to meet which safeguard against vexatious use of the legislation, without having to be constituted.

We therefore recommend that the legislation should adopt a similar set of conditions as those groups have to meet in order to be a 'community participation body' under the Community Empowerment (Scotland) Act.

question5c - the Scottish Government:

No

question5c - a public body (such as the Scottish Land Commission):

Yes

Please provide some reasons for your answers and any additional suggestions in the text box below::

We believe that a public body such as the SLC will reassure groups who are raising a complaint that the issue will be dealt with more impartially and independently than if this was the responsibility of the Scottish Government.

question5d - Recommendation for a mediation process:

Yes

question5d - Recommendation on how the landowner or governing body could comply with the Codes of Practice/protocols:

Yes

question5d - A direction to the landowner or governing body to implement changes to operational and/or management practices:

Yes

Please provide some reasons for your answers and any additional suggestions in the text box below::

We believe all the above to be potentially reasonable outcomes depending on the circumstances of the complaint.

question5e - Financial penalties:

Yes

question5e - 'Cross-compliance' penalties:

Yes

Please provide some reasons for your answers and any additional suggestions in the text box below::

We believe both of these to be appropriate depending on the nature of the breach, particularly in circumstance where there has been a flagrant breach, such as selling or changing the use of land without adherence to the protocols, or disobeying the decision of an investigation.

Following on from our comments above regarding legislation being more effective when it is enforceable, penalties of this kind will increase the effectiveness of the protocols and the wider legislation.

We also support the proposal from Community Land Scotland that disposal of assets should be another potential outcome, with presumption in favour of community ownership where appropriate.

6 Do you think the proposal to make the Land Rights and Responsibility Statement and its associated protocols a legal duty for large-scale landowners would benefit the local community?

Yes

Please give some reasons for your answer in the text box below::

Most of the actions and approaches contained in the protocols are now widely recognised as benefiting local communities.

In particular, from our work supporting good community engagement, including developing the National Standards for Community Engagement, we know that local communities benefit from both the outcomes and the process of community engagement.

On this note, it is worth highlighting that it is good, and meaningful, engagement that will result in the following benefits to communities. This can be ensured by adhering to the National Standards for Community Engagement which are referenced in the Scottish Government's guidance on 'engaging communities in decisions relating to land' but which we would recommend are also reference within the legislation.

In terms of outcomes, decisions about land use affecting communities will be better, and more suited to the priorities of local communities. Given the stake that local communities have in the local environment and surroundings, decisions are also more likely to be sustainable and to lead to good land-stewardship.

In terms of process, continued and meaningful engagement builds the skills, knowledge and confidence of communities so that they are better placed to participate in future planning and decision-making around land and in regard to wider services. Public participation, including community engagement, is now recognised as an essential part of a healthy democracy.

Ongoing relationships and partnership between communities and landowners is likely to be improved by good engagement. Here, it is worth highlighting that landowners are as likely to benefit from good engagement as are communities.

Many of these benefits, and others, are set out in the Scottish Government's advice relating to engaging communities in relation to land. Engaging communities in decisions relating to land: guidance - gov.scot (www.gov.scot).

7 Do you have any other comments on the proposal to make the Land Rights and Responsibility Statement and its associated protocols a legal duty for large-scale landowners?

Please write your answer in the text box below::

Part 6: Compulsory Land Management Plans

8 We propose that there should be a duty on large-scale landowners to publish Management Plans. Do you agree or disagree with this proposal?

Agree

Please give some reasons for your answer in the text box below :

This will increase the likelihood that landowners consider the impact of their land management on communities and the environment in an accountable and transparent way. It will also be an opportunity for landowners to engage proactively with communities at an early stage of planning.

9 How frequently do you think Management Plans should be published?

Please write your answer in the text box below::

Every 5 years would seem proportionate in this instance.

10 Should Management Plans include information on:

question10 - Land Rights and Responsibility Statement compliance:

Yes

question10 - Community engagement:

Yes

question10 - Emission reduction plans:

Yes

question10 - Nature restoration:

Yes

question10 - Revenue from carbon offsetting/carbon credits:

Yes

question10 - Plans for developments/activities that will contribute to local and inclusive economic development or community wealth building:

Yes

Please provide some reasons for your answers and any additional suggestions in the text box below::

All of these are important and we would add housing, climate adaptation and sustainability of local communities to this list, both of which are acute issues in many parts of Scotland, particularly rural areas.

The legislation should require plans to be produced in collaboration with local communities and other relevant stakeholders. This will help to ensure that proper consideration is given to the above as well as to other local priorities. We say more on this in our response to Q13 below.

11 Do you think the responsibility for enforcing compulsory land management plans should sit with:

question11 - the Scottish Government:

Don't know

question11 - a public body (such as the Scottish Land Commission):

Don't know

Please provide some reasons for your answers and any additional suggestions in the text box below::

What is important here is that this enforcement is robust and properly resourced.

From our experience, planning and policy required by legislation, which by law is compulsory, is often not carried out properly when there is a lack of robust enforcement. Some examples from the public sector include: spatial planning (specifically requirements to engage proactively around this) adhering to the Fairer Scotland Duty and having participation request policies in place.

12 Do you think the proposal to make Management Plans a legal duty for large-scale landowners would benefit the local community?

Yes

Please give some reasons for your answer in the text box below :

As the consultation paper outlines, these plans are a basis for community engagement, with all the associated benefits this entails, They are also an opportunity for landowners to consider how land use contributes to net zero, sustainability, housing pressures and other local and national priorities.

13 Do you have any other comments on the proposal to make Management Plans a legal duty for large-scale landowners?

Please write your answer in the text box below::

We would like to see a requirement for landowners to identify which other local plans, particularly those led by communities, have been, or are being, developed when preparing their management plans. Examples include community action plans, local place plans and any community-led plans or surveys relating to housing, the environment and other community priorities. There should be an additional requirement for management plans to reflect the priorities and aims of these plans

This is not an onerous task, and is a proactive form of engagement. Consultation tends to be top-down in that the ideas and plans presented will have been developed in advance of the community being asked for their views. In contrast, community-led plans are bottom-up, reflecting the concerns and priorities of communities.

Of course, these plans may not exist everywhere, and another approach is to build in early and meaningful community engagement into the start before preparing plans. The legislation should, at the very least, advise that early engagement, in line with the National Standards for Community Engagement, will lead to better plans and prevent tension between landowners and communities further down the line.

Part 7 i): Regulating the market in large-scale land transfers - a new Public Interest Test

14 We propose that a public interest test should be applied to transactions of large-scale landholdings. Do you agree or disagree with this proposal?

Agree

Please give some reasons for your answer in the text box below :

We view this type of approach to regulation of land and other transactions as making an essential contribution to meeting ambitions around net zero and also addressing other issues such as mitigating the effects of climate change (or climate adaptation), lack of housing, social care issues and depopulation.

15 What do you think would be the advantages and/or disadvantages of applying a public interest test to transactions of large-scale landholdings?

Please write your answer in the text box below::

It is clear to us that the impact on the rights of property owners is more than balanced out by the need to protect people's fundamental human rights relating to housing, the environment and health and wellbeing.

16 Do you think the public interest test should be applied to:

The seller and buyer

Please give some reasons for your answer in the text box below: :

Both the seller and buyer are likely to have similar levels of interest in a transaction, and should both therefore have an interest in ensuring that the sale is in public interest. We also agree with the reasons set out in the consultation paper for applying a dual approach.

17 If the public interest test was applied to the seller, do you think the test should be considered as part of the conveyancing process?

Don't know

Please give some reasons for your answer in the text box below: :

This is out with our area of expertise.

18 Do you think that all types of large-scale landholding transactions (including transfers of shares and transfers within or between trusts) should be in scope for a public interest test?

Yes

Please give some reasons for your answer in the text box below: :

Where such sales have a bearing on the interests, and in particular to the human rights, of local communities, they should be in scope for this test.

19 Do you agree or disagree with these conditions?

question19 - Condition i.:

Disagree

question19 - Condition ii.:

Agree

Please give some reasons for your answer and suggest any additional conditions in the text box below::

Our answer reflects our prioritising of these conditions.

In the first instance, the land should be offered to constituted community bodies in the area. We would extend this to give a period of time for more informal community organisations to become constituted. This period of time could be triggered if a community group meets conditions similar to the requirements to be a 'community participation body' as set out in part 3 of the Community Empowerment Scotland Act.

20 Do you think that a breach of the Lands Right and Responsibilities Statement should be taken into account when determining the outcome of a public interest test?

Yes

Please give some reasons for your answer in the text box below :

It is possible that such a breach is relevant to the likelihood of a transaction being in the public interest, so breaches should be considered as part of determining the outcome.

21 Do you think that a public interest test should take into account steps taken in the past by a seller to:

question21 - Diversify ownership:

Yes

question21 - Use their Management Plan to engage with community bodies over opportunities to lease or acquire land:

Yes

Please give some reasons for your answer in the text box below :

Again, we believe this could potentially be a relevant factor to consider when determining public interest. Where it is not relevant, the steps do not have to be factored into the final decision, but at least they have been considered.

Please write your answer in the text box below::

1 year

22 Do you think the responsibility for administering the public interest test should sit with:

question22 - the Scottish Government:

No

question22 - a public body (such as the Scottish Land Commission):

Yes

Please provide some reasons for your answers and any additional suggestions in the text box below::

In keeping with our earlier answers, we believe that the SLC is better placed in terms of its overseeing role in respect to land ownership as well as its greater independence.

23 Do you think the proposal that a public interest test should be applied to transactions of large-scale landholdings would benefit the local community?

Yes

Please give some reasons for your answer in the text box below :

If this test is carried out with proper thought to the issues described above, and is robust enough to ensure that it is applied properly, then it should lead to outcomes that are in the best interests of the local community.

24 Do you have any other comments on the proposal that a public interest test should be applied to transactions of large-scale landholdings?

Please write your answer in the text box below::

Part 7 ii): Regulating the market in large-scale land transfers - requirement to notify an intention to sell

25 We propose that landowners selling large-scale landholdings should give notice to community bodies (and others listed on a register compiled for the purpose) that they intend to sell.

Agree

Please give some reasons for your answer in the text box below :

This is also in the public interest, and is in keeping with wider community empowerment and land reform legislation which gives communities priority in terms of being able to register interest. It is also an important aspect of community engagement.

Disagree

Please give some reasons for your answer in the text box below :

This should be longer as it is unreasonable to expect communities to be able to respond adequately in such a short time period. Many community organisations operate entirely in a voluntary capacity and will find it difficult to meet at short notice, never mind co-ordinate a response if required. We suggest extending this to 60 working days or more.

Disagree

Please give some reasons for your answer in the text box below::

Community bodies would need at least 8 months in order to secure funding, such as through the Scottish Land Fund.

26 Do you have any other comments on the proposal that landowners selling large-scale landholdings should give notice to community bodies that they intend to sell?

Please write your answer in the text box below::

Part 8: New conditions on those in receipt of public funding for land based activity

27 Do you agree or disagree with these requirements?

question27 - Requirement i.:

Don't know

question27 - Requirement ii.:

Agree

Please give some reasons for your answer in the text box below :

Without having direct experience in the area we are unsure about the 1st requirement. We note that others have raised concerns that given the huge amount of land that is still to be registered, this requirement could delay the accessing of grants for use of land which benefits communities.

We believe that the 2nd requirement would encourage compliance with both the LRRS and Land Management requirements.

28 Do you have any other comments on the proposals outlined above?

Please write your answer in the text box below::

Part 9: Land Use Tenancy

29 Do you agree or disagree with our proposal that there should be a Land Use Tenancy to allow people to undertake a range of land management activities?

Agree

Please give some reasons for your answer in the text box below: :

We agree with the reasons set out in the consultation paper and think this would be a positive development.

30 Are there any land management activities you think should not be included within a Land Use Tenancy?

Please write your answer in the text box below::

There is a difficult and sensitive balance to be struck in many rural areas of Scotland between environmental concerns and the sustainability of communities in these areas. Thought needs to be given to how to meet the demand for local people to be able to find affordable housing and local employment.

31 Do you think that wider land use opportunities relating to diversification, such as renewable energy and agri-tourism, should be part of a Land Use Tenancy?

Not Answered

Please give some reasons for your answer in the text box below: :

32 Do you agree or disagree that a tenant farmer or a small landholder should, with the agreement of their landlord, have the ability to move their agricultural tenancy into a new Land Use Tenancy without having to bring their current lease to an end?

Not Answered

Please give some reasons for your answer in the text box below: :

33 Do you agree or disagree that when a tenant farmer or small landholders' tenancy is due to come to an end that the tenant and their landlord should be able to change the tenancy into a Land Use Tenancy without going through the process of waygo, with parties retaining their rights?

Not Answered

Please give some reasons for your answer in the text box below: :

34 How do you think the rent for a Land Use Tenancy should be calculated?

Please write your answer in the text box below::

35 Would you use a Land Use Tenancy if you had access to a similar range of future Scottish Government payments which other kinds of land managers may receive?

Not Answered

Please give some reasons for your answer in the text box below: :

36 Do you think that there should be guidance to help a tenant and their landlord to agree and manage a Land Use Tenancy?

Yes

Please give some reasons for your answers and outline who you think should be responsible for writing and managing the guidance in the text box below::

This would be an opportunity to go beyond guidance on the formal process, and should cover ways of working together in partnership, outlining how to establish shared goals and work towards these collaboratively.

In our experience, the best guidance has been co-produced by stakeholders which, in this case, could include both tenants and landlords. This would require facilitation by an independent organisation with knowledge in the field of tenancy and community land use.

37 Do you think there should be a process to manage disputes between a tenant of a Land Use Tenancy and their landlord?

Yes

Please give some reasons for your answers and outline how this process could be managed in the text box below::

While the guidance above could cover how to resolve disputes, we believe that it would be worth considering mediation as a way to manage disputes as the first stage of the process, facilitated by mediation organisations.

If mediation failed, or was not acceptable to the parties, some kind of external arbitration should be considered. This could be through the Scottish Land Court as below. If CLS were to have roles in other areas of managing disputes (such as complaints regarding breaches of protocol by landholders) then it could also make sense to extend this role to arbitrate disputes over Land Use Tenancies.

38 Do you agree or disagree that tenants of a Land Use Tenancy and their landlords should be able to resolve their legal disputes in relation to the tenancy through the Scottish Land Court?

Don't know

Please give some reasons for your answers and outline additional ways in which disputes could be resolved in the text box below::

While we believe a form of external arbitration would be helpful, we do not know enough about the Scottish Land Court to answer definitively.

39 Do you have any other comments on our proposal for a Land Use Tenancy?

Please write your answer in the text box below::

Part 10: Small landholdings

40 Would you like to be kept informed via email about the Small Landholding Consultation for the Land Reform Bill? We would use the email you provide in the 'About you' section to contact you.

Yes

Part 11: Transparency: Who owns, controls and benefits from Scotland's Land

41 Do you agree or disagree with our proposal to explore:

question41 - Who should be able to acquire large-scale landholdings in Scotland:

Agree

question41 - The possibility of introducing a requirement that those seeking to acquire large-scale landholdings in Scotland need to be registered in an EU member state or in the UK for tax purposes:

Don't know

Please give some reasons for your answer in the text box below: :

We strongly agree that there should be an exploration of who should be able to acquire large-scale landholdings in Scotland. The long-term aim should be to ensure that Scotland's land and who owns it is in the best interests of people in Scotland, while also being in the best interests of the wider planet (in terms of combatting global warming).

Different options for restricting who can own land should be considered, but the reasons for, and implications of, restricting ownership to people in different parts of the world should be carefully considered. The reasons provided in the consultation paper for restricting ownership to those tax-registered in the UK or EU are arbitrary.

It may be better to concentrate on other ways to ensure land ownership benefits the people of Scotland, including controls on the amount of land that can be concentrated by one owner, as was proposed in the Land Reform Review Group Report (2014).

There is also the option of taking more radical steps to give communities more influence and say over the land they live and work on. We appreciate this is already a key ambition, but we see it is intricately linked with the question of who is able to own land. The more empowered communities are in respect to land, the more ownership and stewardship will be in the interests of all.

Part 12: Other land related reforms

42 Do you have any views on what the future role of taxation could be to support land reform?

Please write your answer in the text box below::

Generally speaking, SCDC advocates that there should be increased use of deliberative democracy to inform tax policy in relation to land reform and other issues, including national-level citizens assemblies as well as smaller citizens panels (these can work at a local level where appropriate or be a way for those affected by an issue to contribute to decision making).

We believe deliberative democracy has shown its potential to generate and provide support for the brave policy decisions required to address a range of issues including climate change, inequality and abortion (in the case of Ireland). SCDC was directly involved in Citizen's Assembly of Scotland, which prioritised actions around sustainability and tackling poverty. Tax and redistribution was an area which assembly members were keen to focus on and a range of progressive measures were identified and supported.

43 How do you think the Scottish Government could use investment from natural capital to maximise:

Please write your answer in the text box below::

Early and meaningful community engagement – local communities need to be involved from the start in planning how to make use of natural capital. Approaches to doing this include supporting more community action plans with greater commitment to using these to inform higher level plans and decision making.

More communities need to be empowered to use land in order to benefit from natural capital. Community development support should be targeted towards disadvantaged communities in both urban and rural areas so that they can begin to consider available options in terms of land ownership and tenure, and have more influence over the decisions about natural assets that affect them.

Community benefit clauses should be a requirement in any procurement contracts investing in natural capital. Proactive community engagement, as described above, will be an opportunity for local communities to shape these clauses and ensure they match local people's priorities.

Participatory budgeting should be promoted and supported as a way for resources to be invested democratically. This should learn from and build on Scotland's Green PB initiative which has been working to support different ways that PB can be utilized to support people to be involved in decisions affecting their communities and the environment.

Please write your answer in the text box below::

We believe there will be scope to use revenue generated from natural capital as part of efforts to create a fairer and more sustainable Scotland. Once again, the use of deliberative democracy such as citizens assemblies should be used to inform and support these braver policy decisions.

44 Do you have any additional ideas or proposals for Land Reform in Scotland?

Please write your answer in the text box below::

We have indicated throughout our response that the issue of lack of affordable housing is a priority in many rural communities. Suggestions to address this, through this or other legislation, would include:

- Following Wales in making holiday homes a different use class, so that they can be taxed as such.

- Giving local authorities more power to reclassify homes, to set council tax rates of second homes, and to increase land and business transaction tax where appropriate (again following Wales).
- Licensing schemes for holiday lets.

Another issue we have raised in our response to previous questions is that of climate adaptation. Climate change is already having and will continue to have a detrimental effect on many communities. Wherever possible, land use legislation needs to encourage and support local efforts to mitigate against the effects of climate change, in addition to ensuring land use contributes to meeting targets for net zero.

Part 15: About you

What is your name?

Name:
Andrew Paterson

What is your email address?

Email:
andrew@scdc.org.uk

Are you responding as an individual or an organisation?

Organisation

What is your organisation?

Organisation:
Scottish Community Development Centre

The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:

Publish response with name

We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

Yes

I confirm that I have read the privacy policy and consent to the data I provide being used as set out in the policy.

I consent

Part 16: Evaluation

Please help us improve our consultations by answering the questions below. (Responses to the evaluation will not be published.)

Matrix 1 - How satisfied were you with this consultation?:
Slightly satisfied

Please enter comments here.:

Matrix 1 - How would you rate your satisfaction with using this platform (Citizen Space) to respond to this consultation?:
Slightly satisfied

Please enter comments here.: