

Response ID ANON-5AGP-W1HC-Z

Submitted to Land Reform in a Net Zero Nation
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Part 1: The road to reform

Part 2: The next step: Land Reform in a Net Zero Nation – the forthcoming Bill

Part 3: Overview of the proposals

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:
Agree

question1 - c) Land that accounts for more than a specified minimum proportion of a permanently inhabited island:
Agree

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

To meaningfully tackle the adverse impacts of the scale and concentration of landownership in Scotland, tackle the biodiversity crisis and achieve a just transition to net zero, the measures contained within this Bill should go beyond the narrow focus on a small number of extremely large estates.

Environmental Rights Centre for Scotland (ERCS) assist the public and civil society to understand and exercise their rights in environmental law and to protect the environment. It is our view that 3,000 hectares is too large a threshold and would permit a number of large landholdings to avoid public interest tests for transfers and acquisitions, diluting the potential to improve social and environmental outcomes across Scotland. It would mean only one fifth of Scotland's land area would be covered by the reforms.

We note that the Scottish Land Commission has suggested that the threshold could be as low as 1,000 hectares. However to hold as many landowners as possible accountable, we would support a threshold of 500 hectares. We stress that the threshold should refer to the aggregate portfolio of land held by an owner, rather than treat individual parcels of land held by the same owner in isolation (i.e. a landowner owning two holdings each of 250 hectares would meet the threshold). Without such provisions, there is a risk that some landowners may 'salami slice' their landholdings to avoid meeting the threshold.

By setting a hectareage threshold at, or closer to, 500 hectares, more landholdings will be impacted by the Bill and the need for a separate threshold proposed as part (b) will be significantly lessened.

For both (b) and (c), the specified proportion should not exceed 20% of the land area, so no landowner can monopolise land base resources and restrict access for other residents. However, we strongly believe this threshold should be decided by the community of each place. We recommend referring to the consultation response by Common Weal, and their policy paper on 'Development Councils', for illustrations of how such reforms could apply in practice.

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::

Family farms derive economic benefits similar to other landowners, and their land management practices can trigger adverse social, economic and environmental impacts that should not be overlooked. The cumulative impact of all large-scale family farms across Scotland is significant for rural economies.

An exemption for family farms would create a significant loophole in the legislation. In both the current and proposed new system, farmers receive basic payments proportionate to the amount of land that they have, so exempting large-scale family farms will further compound rural inequalities. Proposals should take into account what amount of public subsidy landowners receive on an annual basis. Large-scale family farms operate commercially similar to other businesses, and providing exemptions could further concentrate their landholdings while limiting new entrants into the sector.

The Scottish government's own vision for agriculture refers to its aim to diversify the agricultural sector, and exempting large-scale family farms would be a regressive step in this regard. Existing arrangements tend to favour an older, male, wealthier, white demographic, leaving younger, lower-income, women and more racially diverse community members significantly disadvantaged in entering community land ownership.

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::

Landownership can be concentrated in Scotland's towns and cities, with landlords owning and controlling significant property portfolios, and/or vacant and derelict land that could be used for public benefit.

The Land Rights and Responsibilities Statement applies to all urban and rural land in Scotland and it is not clear why these responsibilities should have a lower level of enforcement in urban areas. Similarly, it is not clear why urban communities should not benefit from a public interest test in the sale of large landholdings, or why those excluded from purchasing large-scale landholdings in rural areas should be able to do so in urban areas.

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::

ERCS agrees that there should be a legal duty for landowners with holdings over a defined threshold to comply with the Land Rights and Responsibilities Statement.

Without a legal duty to comply the statement and associated protocols are not enforceable and landlords in breach will not be held accountable to address non-compliance and any adverse impacts that have occurred.

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::

ERCS fully supports the principle of a statutory process to adjudicate on complaints about non-compliance and the response to a breach of the Land Rights Responsibility Statement and associated protocols. Independent adjudication and enforcement are superior to purely voluntary approaches in order to achieve the level of social, ecological and economic change required.

The objective must be to provide a robust mechanism to hold landowners to account and provide a common reference point clarifying rights and responsibilities for different land users/stakeholders. However, for this to be enforceable, the statutory Codes of Practice/protocols that need to be developed must be clearly defined so that those subject to the Codes/protocols are clear on their responsibilities and potential breaches can be identified and reported. The Land Commission are best placed to advise on the development of these policy statements, and continue as the advisory and monitoring body to inform executive decision-making and regulatory functions.

With regards to regulation and enforcement, we would caution against complicating or combining both advisory and adjudication roles, as is currently the case with the Tenant Farmer Commissioner. In our view, it is preferable to understand the executive/regulatory function as sitting with the relevant government department, i.e. the local authority. Therefore any complaint should be, in the first instance, considered by the delegated department.

If a decision is refuted by either party, the appeals process should be a judicial function of a specialist Environmental Court or Tribunal (ECT), that has expertise to adjudicate on such matters. Such a court could be established through providing additional powers to the 'expanded Scottish Land Court' (the merged Scottish Land Court with the Lands Tribunal for Scotland). See our report on 'Why Scotland needs an environmental court or tribunal' to ensure that access to justice is affordable, accessible, timely, and effective. Development of caselaw would inform policy and regulatory development.

We stress that all procedures must be comprehensible and accessible to all citizens wishing to pursue complaints, with support available for citizens in the form of free advice and representation.

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::

ERCS strongly disagrees that only constituted groups could report breaches. There may be situations where there is not a 'constituted organisation with a connection to the local area' in a given locality where landowner infringement of the statement occurs e.g. remote parts of the Highlands. We therefore support any concerned citizen or non-constituted groups to also be able to report breaches.

Communities most exposed to environmental harms arising from poor land management may not be represented by a formal organisation. Efforts must be taken to ensure unincorporated community groups and any concerned individual are also recognised as legitimate actors.

In addition, it may be challenging and risky for communities of place to make complaints about large landowners, with personal repercussions (harassment, discrimination or other reprisals), so there should be provisions for anonymity to protect identities.

Since land management practices impact environmental conditions well beyond the immediate locality (e.g. the impact of tree planting/deforestation on hydrology and downstream flooding), we also recommend removing the requirement for having 'connection to the local area' so that any person or group who becomes aware of a breach is able to pursue a complaint.

question5c - the Scottish Government:

Yes

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

No

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

In our view, it is important to avoid overlapping functions and promote democratic accountability. Complaints should therefore be investigated and dealt with by the relevant government department or local authority, whose remit extends to executive decision-making. The Scottish Land Commission should remain as an advisory and monitoring body.

If the outcome of a complaint is refuted by either party, the appeals process should be a judicial function of a specialist Environmental Court or Tribunal (ECT), that has expertise to adjudicate on such matters. Such a court could be established through providing additional powers to the 'expanded Scottish Land Court' (the merged Scottish Land Court with the Lands Tribunal for Scotland). See our report on 'Why Scotland needs an environmental court or tribunal' to ensure that access to justice is affordable, accessible, timely, and effective. Development of caselaw would inform policy and regulatory development.

We stress that all procedures must be comprehensible and accessible to all citizens wishing to pursue complaints, with support available for citizens in the form of free advice and representation.

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::

There needs to be clear consequences for a breach to hold landowners to account.

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::

Financial penalties are necessary but not sufficient, and their efficacy as a deterrent depends on the level set and if this is proportionate to the wealth of large landowners. If it is too low it will not deter poor practice. We support 'cross compliance' penalties. Penalties should also include the possibility of breaking up or confiscating large landholdings if repeated breaches occur.

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::

Legal duties for large-scale landowners could act as a corrective to the perverse incentive structures that frequently reward short-term profit-making opportunities over social and environmental objectives. Examples abound, ranging from speculation on land values driving up land prices and limiting affordable housing, to the burning heather for grouse moors on large estates, and excessive use of pesticides and chemical fertilisers to boost short term crop yields at the expense of soil health and water quality. The statement and associated protocols could go some way towards increasing local

accountability.

However, community benefits will be limited unless local democracy is strengthened and there are clear processes for communities to engage with the contents of the statement/protocols in a meaningful and substantive way. Citizens' Assemblies around land use and planning could also be beneficial in this regard. We recommend consulting Common Weal's proposal for strengthening local democracy:
<https://commonweal.scot/policies/development-councils-a-proposal-for-a-new-system-of-local-democracy-in-scotland/>

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::

No

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 :

Management Plans can play an important role in ensuring landowners are working towards their responsibilities while consulting with their communities and stakeholders. Management plans must set an example, demonstrating how they will safeguard substantive rights to a healthy environment, mitigate against the climate and biodiversity crises, and include clear benchmarks to measure progress in each of these areas.

This approach may also open up greater opportunities for collaboration, where Management Plans are developed in neighbouring areas, although this would have greatest impact when applied to a smaller definition of large-scale landholding, as discussed in response to question 4(c).

We also consider that management plans should be a duty of all landowners, not just those deemed 'large-scale'. There must be strengthened requirements for landowners to engage with communities, and to seek their consent on local land management decisions.

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

Please write your answer in the text box below::

Every five years as a minimum, but any significant change in land use or change in ownership should instigate a revised management plan which is published.

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::

ERCS supports objectives in all of these areas.

Plans should include information on how they will uphold the six substantive features of the human right to a healthy environment: clean air, safe climate, safe water, healthy and sustainably produced food, non-toxic environments, and healthy biodiversity and ecosystems.

Regarding inclusive economic development, plans should also address how they will mitigate/reduce inequality in the concentration of landholdings, strengthen tenants' rights, and increase diversity within the land sector (e.g. in agriculture/forestry). Plans should be devised in a participatory manner, involving the input of all those who live, work and derive recreational benefit from a designated land area.

We oppose selling carbon credits to offset current or future emissions, as this can perpetuate unsustainable practices elsewhere and delay necessary action to cut emissions in industrial sectors. The use of carbon credits remains vulnerable to fraud and misuse in carbon accounting practices, and should be properly scrutinised under land management plans.

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

question11 - the Scottish Government:

Yes

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

No

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

We refer back to our answer to 5(a), supporting clear distinctions between the advisory, enforcement and judicial functions of the Scottish Government and other public bodies. Persistent failure to comply should be adjudicated by a specialist environmental court or tribunal.

Enforcement officers should be aware of the risk that these Plans become a tick-box exercise in which landowners provide standardised information in order to meet a legal obligation. We would support an approach that encourages creativity and innovation within Plans.

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: :

If all Management Plans as outlined above are transparent, open to public scrutiny, and include meaningful opportunities for public participation, there will be benefits for the local community and tangible progress towards a just transition to net zero and tackling the climate and biodiversity crises.

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::

Management plans should be developed with the community and over a certain size (e.g. 3,000 hectares), independently assessed by scientists and ecologists with relevant land management expertise.

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: :

Existing arrangements have resulted in exceptionally high concentrations of landholdings and land management practices, with minimum constraints. These are contrary the public interest in terms of social, economic and environmental sustainability and community wealth-building. Land should be viewed as a strategic national asset, particularly in the context of the crises of climate and nature loss. It is reasonable that transactions of land be subject to a public interest test.

ERCS reiterates the need for public interest tests to apply to landholdings at a much lower threshold than currently proposed, e.g. 500 ha.

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::

The advantage would be to change the incentives and calculations made by large landowners, increasing accountability and representing an important first step in democratising decision-making around land.

A well-defined and enforced public interest test could help ensure that large landholdings are contributing to our shared national objectives of restoring nature and tackling climate change, while being aware of the particular impacts of concentrated landownership on communities.

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 benefit from land transactions so the public interest test should be applied to both.

The test must also apply to aggregate landholdings. If the buyer already owns land above the threshold set, then the land being sold should be subject to a public interest test regardless.

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?

Yes

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

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: :

This should include inherited land, as recommended by the Land Commission. Trusts are often used to minimise tax obligations. Any exemptions in methods of transfers would build in loopholes, and this would inherently be against the public interest.

19 Do you agree or disagree with these conditions?

question19 - Condition i.:

Agree

question19 - Condition ii.:

Agree

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

While community ownership can have immense benefits and will be appropriate in many areas, it is not always the case that community bodies will have the capacity, skills, or desire to take on large landholdings. ERCS supports Scottish Environment LINK's suggestion that environmental NGOs should also be offered the opportunity to purchase land in these circumstances, and allowing partnership approaches, for example where community groups and environmental NGOs could collaboratively purchase land.

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: :

Landowners who have severely or repeatedly breached their responsibilities as a steward of land have shown themselves to be unworthy of either holding or acquiring the land subject to the test.

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: :

This would incentivise good land stewardship.

Please write your answer in the text box below::

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

question22 - the Scottish Government:

Yes

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

No

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

We believe that the Scottish Government should bear responsibility for administering the public interest test, and the Scottish Land Commission should maintain its position as a monitoring, evaluation and advisory body. Please refer to our answer to question 5(a) for further details.

Whatever body is tasked with oversight, communities of place should have a role in the process, with their capacity to participate supported by statutory

authorities.

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 :

A robust public interest test could increase the accountability of private landowners to local communities.

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::

The public interest test should include delivering environmental outcomes, linked to the objectives of the Scottish Biodiversity Strategy and national emissions reductions targets, as well as relevant Regional Land Use Frameworks.

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 :

Community bodies should have first preference to acquire land.

Disagree

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

We believe 30 days is too short a period for community bodies to make an expression of interest, and recommend a period of 90 days.

Disagree

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

We recommend a longer timeframe of one year due to difficulties encountered by community bodies in accessing funding.

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::

As in our response to question 19, ERCS would support the inclusion of environmental NGOs in the bodies to be notified of an intention to sell.

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.:

Agree

question27 - Requirement ii.:

Agree

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

Registration with the Land Registry is essential for transparency, democracy, and modernising Scotland's land system (including through progressive taxation and policy measures such as a land value tax).

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

Please write your answer in the text box below::

No.

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 :

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::

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?

Yes

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?

Agree

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?

Don't know

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?

Don't know

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::

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::

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?

Agree

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

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.

No

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:

Agree

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

We support efforts to restrict absentee landowners, prevent wealth extraction by wealthy companies or individuals, and increase openness and transparency concerning who owns and benefits from Scotland's land.

We think this investigation should go further to ensure owners are not registered in tax havens, some of which are within EU jurisdictions.

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::

We support the introduction of a land value tax, in recognition of the fact landowners often benefit financially from rising land values responding to public investment in infrastructure, public services etc.

We support removing exemptions on inheritance tax for land.

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::

N/A

Please write your answer in the text box below::

N/A

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

Please write your answer in the text box below::

N/A

Part 13: Assessing impact

45 Are you aware of any examples of how the proposals in this consultation might impact, positively or negatively, on island communities in a way that is different from the impact on mainland areas?

Please write your answer in the text box below::

46 Are you aware of any examples of particular current or future impacts, positive or negative, on young people, (children, pupils, and young adults up to the age of 26) of any aspect of the proposals in this consultation?

Please write your answer in the text box below::

47 Are you aware of any examples of how the proposals in this consultation may impact, either positively or negatively, on those with protected characteristics (age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation)?

Please write your answer in the text box below::

48 Are you aware of any examples of potential impacts, either positive or negative, that you consider any of the proposals in this consultation may have on the environment?

Please write your answer in the text box below::

49 Are you aware of any examples of how the proposals in this consultation might impact, positively or negatively, on groups or areas at socioeconomic disadvantage (such as income, low wealth or area deprivation)?

Please write your answer in the text box below::

50 Are you aware of any potential costs and burdens that you think may arise as a result of the proposals within this consultation?

Please write your answer in the text box below::

51 Are you aware of any impacts, positive or negative, of the proposals in this consultation on data protection or privacy?

Please write your answer in the text box below::

Part 15: About you

What is your name?

Name:

Benjamin Brown

What is your email address?

Email:

bbrown@ercs.scot

Are you responding as an individual or an organisation?

Organisation

What is your organisation?

Organisation:

Environmental Rights Centre for Scotland

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

Publish response only (without 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.:

This was comprehensive and with good background information.

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.:

It would have been helpful to be able to download the application form to review more easily, read across sections and share with other stakeholders to support a comprehensive response.