

HOPS Response to the Scottish Government Consultation on Land Reform in a Net Zero Nation (30th October 2022)

Information Note

Heads of Planning Scotland (HOPS) is the representative organisation for senior planning officers from Scotland's local authorities, national park authorities and strategic development planning authorities. The purpose of HOPS is to:

- Promote the profile of public sector land use planning
- Support and promote excellence in planning leadership
- Ensure the delivery of a culture of continuous improvement in planning authorities
- Provide advocacy and coordination to ensure that planning authorities are properly resourced to deliver quality outcomes.

This consultation response covers general points raised by planning authorities we note however there may be local issues and information raised within individual local authority responses.

HOPS would like to thank planning authorities for their contribution to this consultation response.

Part 4: Criteria for large-scale landholdings

Q1. Do you agree or disagree with the criteria proposed for classifying landholdings as 'large-scale'?

- | | |
|---|-------------------|
| a) A fixed threshold of 3,000 hectares | Disagree |
| 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 | Don't Know |
| 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 answer and outline any additional criteria:

Option a): It may be more useful to classify landholdings as significant rather than large-scale. A fixed threshold of 3,000 hectares is perhaps too arbitrary – the figure falls generally within the correct range, but more clarity is needed as to why this figure was arrived at.

Option b): HOPS would disagree in principle with using a fixed percentage of local authority wards due to the vast differences in size that can occur between different wards. There may be some merit in using data zones for this purpose, but it is hard to say with certainty.

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Regarding the use of Scottish Government's six-fold urban/rural classification scheme, there is no clarity on why this has been chosen over the eight-fold scheme linked in the same document. Similarly, more clarity is needed on why these variations exist if only one scheme is ultimately going to be used. These schemes also present anomalies in certain locations – for example, there may be an area classified as an 'accessible town' that is surrounded completely by a 'large urban area', yet is not included within said large urban area.

Option c): HOPS would agree in principle with there being a specified minimum proportion of a permanently inhabited island, but more detail is needed on what this minimum would be.

Overall, HOPS would support the view of the Scottish Land Commission that any classification should encompass a combination of factors rather than one single measure.

Q2. Do you agree or disagree that family farms should be exempt from the proposals outline in Parts 5 to 7 even if they are classified as a 'large-scale' landholding? **Disagree**

Please give some reasons for your answer:

In general there is no reason for an upfront exemption on these grounds. Each case should be assessed & scoped individually to discern if there are grounds for exemption.

More clarity is needed on what would be defined as a 'family farm' in this circumstance.

Potential change in ownership issues may arise.

Q3. Do you think that the proposals considered in this consultation should be applied to the urban context? **Don't Know**

Please give some reasons for your answer:

There is no significant reason why these principles could not be applied in an urban context, as similar issues remain around e.g. concentration of power. However, the mechanisms for applying said principles and the criteria for assessment would inevitably be different than the proposals in this consultation due to the differences in urban and rural contexts – urban and rural lands are managed differently and for different objectives.

Urban areas could be identified as growing spaces, amenity areas/green spaces and buildings. Rural lands serve a similar purpose, but with much more scope. Peri-urban lands i.e., green belts, are for the most part still actively farmed and should be included.

There may be a need for a different definition of a 'large-scale' landholding in an urban context: a landowner may own a series of sites scattered across a community that together have a negative impact on an urban community.

Part 5: Strengthening the Land Rights and Responsibilities Statement

Q4. 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:

HOPS are generally supportive of a duty being imposed.

Some local authorities have reported demonstrable benefits that have come about through the LRRS protocols, and the work of the Good Practice Advisory Group.

HOPS support the need to bring benefits to Scotland at all levels, including the contribution to the Scottish Government 'Just Transition to Net Zero' mission.

Q5. 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.

a) Do you agree or disagree with the proposal above? Agree

Please give some reasons for your answer:

HOPS would agree in principle with the above proposal and recognise that the process requires mediation and independent overview. However, we would caution that local planning authorities would not be minded to take on any responsibility with regards to the enforcement of any proposals outlined above. Across the board, public sector budgets continue to be stretched, and planning authorities would therefore have concerns about committing to any new duties.

HOPS would support the responsibility for these proposals sitting with a public body who are better placed to handle such matters, such as e.g. the Scottish Land Commission.

b) you agree or disagree that only constituted organisations that have a connection to the local area or the natural environment should be able to report breaches of the Land Rights and Responsibility Statement? Don't Know

Should these constituted organisations have a remit on:

- Community Don't Know
- Charity Don't Know
- Public service Don't Know

Please provide some reasons for your answers and any additional suggestions:

No comments

c) Do you think the responsibility for investigating and dealing with complaints should sit with:

- The Scottish Government Don't Know
- A public body (such as the Scottish Land Commission) Don't Know

Please provide some reasons for your answers and any additional suggestions:

HOPS do not have a position on who should be responsible for the above.

HOPS would suggest that whichever body ultimately become responsible for handling complaints and monitoring any breaches would need to make any information on complaints/breaches available to other relevant public bodies such as local authorities and key agencies.

More clarity is needed at this stage around a) who exactly would be responsible and b) the associated reporting mechanisms to this person/body.

d) Should the potential outcome from an investigation of a breach be:

- Recommendation for a mediation process **Don't Know**
- Recommendation on how the landowner or governing body could comply with the Codes of Practice/protocols **Don't Know**
- A direction to the landowner or governing body to implement changes to operational and/or management practices **Don't Know**

Please provide some reasons for your answers and any additional suggestions:

HOPS have been made aware of the new Tenant Farmer Commissioner role launched by the Scottish Land Commission in 2021 – this seems to be a good practice example for the establishment of a mediation scheme for handling complaints and resolving disputes¹.

There is potential that all of the options in part d) could be suitable, depending on the circumstances and the level of the breach.

e) Should the enforcement powers for a breach be:

- Financial penalties **Don't Know**
- 'Cross-compliance' penalties **Don't Know**

Please provide some reasons for your answers and any additional suggestions:

No comments

Q6. 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?

Don't Know

Please give some reasons for your answer:

Whilst any evidence of community benefit would be welcomed by HOPS, it is difficult at this stage to have certainty on whether a legal duty would bring about said benefit. More investigation is needed in future.

Q7. 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?

This may come down to what is perceived as 'good' land stewardship. For example, some large-scale landowners have undertaken rewilding projects, and whilst rewilding is an important land use activity in its own right, without associated land management it can have other consequences in terms of e.g. limiting public access, loss of biodiversity, and compromising food security.

Part 6: Compulsory Land Management Plans

¹ <https://www.landcommission.gov.scot/our-work/tenant-farming/mediation-scheme>

Q8. We propose that there should be a duty on large-scale landowners to publish Management Plans. Do you agree or disagree with this proposal? Don't Know

Please give some reasons for your answer:

HOPS agree in principle that the publication of Management Plans would be useful. However, there is a need to ensure that these fit in with other statutory mechanisms for land management and reporting; ideally these would complement each other rather than this becoming another tick box exercise. Similarly, such Management Plans should take account of relevant spatial plans that the landholding is subject to, including NPF4; the Local Development Plan; and the open space strategy.

This may be better sitting under the Scottish Land Rights and Responsibilities Statement and associate codes of practice – this would reduce the amount of statute and ensure flexibility for other changes.

For Management Plans to function as intended, associated costs should be included, and information on whether these will be covered by grant funding or using personal resources.

Q9. How frequently do you think Management Plans should be published?

As Local Development Plans and the National Planning Framework are moving to ten-year cycles, HOPS would suggest that Management Plans also run on a ten-year cycle.

However, these should be reviewed every five years, which would tie in with the periodic review of the Land Rights and Responsibility Statement.

Q10. Should Management Plans include information on:

- | | |
|--|------------|
| - Land Rights and Responsibility Statement Compliance | Yes |
| - Community engagement | Don't Know |
| - Emission reduction plans | Yes |
| - Nature restoration | Yes |
| - Revenue from carbon offsetting/carbon credits | Yes |
| - Plans for development/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:

HOPS would welcome any proposals that increase transparency around land use.

All of the above topics are relevant and would show how the landowner proposes to support the national objectives to just transition and net zero. They would also allow the community and the local authority to identify key deliverables to support the shared journey towards net zero.

An answer of 'Don't Know' has been recorded regarding the inclusion of information on community engagement, as more clarity is required on what exactly is being proposed.

There is a possibility that some of the inclusions above – emission reductions plans, nature restoration and revenue from carbon – may be better covered through other existing or developing regimes. However, there could also be value in management plans being a single source of information for the items listed, and other developing regimes such as those in the agriculture bill.

Any introduction of management plans would need to be accompanied by a standardised methodology for data recording and appropriate mechanisms for monitoring whether progress has been made on e.g. nature restoration, emission reduction, etc.

If there is no ability to record and monitor whether any included goals or aims have been met, it will be a) difficult to discern whether there has been a positive benefit to local communities and/or local authorities and b) difficult to inform future decisions on refreshed management plans.

Q11. Do you think the responsibility for enforcing compulsory land management plans should sit with:

- The Scottish Government **Don't Know**
- A public body (such as the Scottish Land Commission) **Don't Know**

Please provide some reasons for your answers and any additional suggestions:

HOPS do not have a position on who should be responsible for the above. However, this proposal requires a body to have clear ownership of land management plans and their enforcement.

HOPS would caution that local planning authorities would not be minded to take on any responsibility with regards to the enforcement of compulsory land management plans. Across the board, public sector budgets continue to be stretched, and planning authorities would therefore have concerns about committing to any new duties.

Q12. Do you think the proposal to make Management Plans a legal duty for large-scale landowners would benefit the local community? **Don't Know**

Please give some reasons for your answer:

Whilst any evidence of community benefit would be welcomed by HOPS, it is difficult at this stage to have certainty on whether a legal duty would bring about said benefit. More investigation is needed in future.

Q13. Do you have any other comments on the proposal to make Management Plans a legal duty for large-scale landowners?

If this were to occur, it would need to align with the other asset management plans within the statutory planning system, including NPF4 and the respective Local Development Plan.

Part 7: Regulating the market in large-scale land transfers: a new Public Interest Test, and a requirement to notify an intention to sell

What we propose: (1) – a Public Interest Test for large-scale land transfers

Q14. We propose that a public interest test should be applied to transactions of large-scale landholdings. Do you agree or disagree with this proposal? **Don't Know**

Please give some reasons for your answer:

HOPS would support any measures that would increase the resilience and sustainability of local communities. Opportunities to increase local or community ownership of land where this is desired by the community would also be welcomed.

However, HOPS do not have a view on whether the proposal outlined above is the correct one going forwards.

HOPS note the difficulties of discerning what falls within the remit of the devolved powers and welcome the aim to engage with the UK Government in further discussions about land ownership legislation.

Q15. What do you think would be the advantages and/or disadvantages of applying a public interest test to transactions of large-scale holdings?

In comparison with a Compulsory Purchase Order (CPO), there is some potential that a PIT would not require much additional local authority resourcing to deliver land for development – particularly where the developer is a third party and where land ownership, rather than any other constraint, is the main barrier to development.

For example, one scenario in which the PIT could be a potential solution is where there is a robust plan for community-led development/housing, all consents granted (or as close as possible), a clear local need, and finance agreed, but an unwilling seller. The PIT when triggered would make an assessment of all those factors and could, as part of allowing the transfer of land to proceed, apply conditions that compel subsequent sale/transfer of land to meet those needs and facilitate development.

The main drawback of the PIT vs a CPO is that this requires a transfer to occur, which may not happen for years, if ever. In terms of the actual mechanism, the judgement made in a PIT case will not differ much from that of a CPO case, and will be equally as likely to be challenged through the courts.

Overall, the PIT mechanism may require less resource from Local Authorities but may be more unreliable, whilst a CPO is resource intensive but provides certainty as well as clear timescales.

Q16. Do you think the public interest test should be applied to:

The seller only / The buyer only / The seller and buyer / **Don't Know**

Please give some reasons for your answer:

No comments

Q17. 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:

No comments

Q18. 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?

Don't Know

Please give some reasons for your answer:

No comments

Q19: We have proposed that if a public interest test applied to the seller concluded there was a strong public interest in reducing scale/concentration, then the conditions placed on the sale of the land could include:

i) The land in question should be split into lots and could not be sold to (or acquired by) one party as a whole unit

ii) The land, in whole, or in part, should be offered to constituted community bodies in the areas, and the sale can only proceed if the bodies consulted, after a period of time, indicate that they do no wish to proceed with the sale

Do you agree or disagree with these conditions?

- Condition i. **Don't Know**
- Condition ii. **Don't Know**

Please give some reasons for your answer and suggest any additional conditions:

No comments

Q20. Do you think that a breach of the Land Rights and Responsibilities Statement should be taken into account when determining the outcome of a public interest test? **Don't Know**

Please give some reasons for your answer:

HOPS to not have an overall position on the above: it is however acknowledged that if the LRRS has been breached, then it may potentially be in the public interest to sell.

Q21. Do you think that a public interest test should take into account steps taken in the past by a seller to:

a) Diversify ownership **Don't Know**

b) Use their Management Plan to engage with community bodies over opportunities to lease or acquire land **Don't Know**

Please give some reasons for your answers:

HOPS do not have an overall position on the above but would generally welcome any evidence that the landowner had engaged with the community when considering long-term stewardship.

c) What time period do you think this should cover?

No comments

Q22. Do you think the responsibility for administering the public interest test should sit with:

- The Scottish Government **Don't Know**
- A public body (such as the Scottish Land Commission) **Don't Know**

Please provide some reasons for your answers and any additional suggestions:

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HOPS do not have a position on who should be responsible for the above. HOPS would caution that local planning authorities would not be minded to take on any responsibility with regards to the administration of a public interest test. Across the board, public sector budgets continue to be stretched, and planning authorities would therefore have concerns about committing to any new duties.

Q23: Do you think the proposal that a public interest test should be applied to transactions of large-scale landholdings would benefit the local community? **Don't Know**

Please give some reasons for your answer:

Whilst any evidence of community benefit would be welcomed by HOPS, we cannot say with certainty whether the above proposal would bring about said benefit.

Q24. Do you have any other comments on the proposal that a public interest test should be applied to transactions of large-scale landholdings?

Please see Question 15 for more detailed comments on the potential advantages/disadvantages of the PIT. There is also a need to look in more detail at how this would apply in an urban context.

What we propose: (2) – a prior notification of intention to sell

Q25. 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.

a) Do you agree or disagree with the proposal above? **Don't Know**

Please give some reasons for your answer:

No comments

b) Do you agree or disagree that there should be a notice period of 30 days for the community body or bodies to inform the landowner whether they are interested in purchasing the land?

Don't Know

Please give some reasons for your answer:

No comments

c) If the community body or bodies notifies the landowner that they wish to purchase the land during the notice period, then the community body or bodies should have 6 months to negotiate the terms of the purchase and secure funding. Do you agree or disagree with this proposal?

Don't Know

Please give some reasons for your answer:

No comments

Q26. 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?

HOPS do not have an overall position on the above at this stage but would generally welcome any evidence that the landowner had engaged with the community when considering long-term stewardship.

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

Q27. We propose the following eligibility requirements for landowners to receive public funding from the Scottish Government for land based activity:

- i. All land, regardless of size, must be registered in the Land Register of Scotland.**
- ii. Large-scale landowners must demonstrate they comply with the Land Rights and Responsibility Statement and have an up to date Land Management Plan.**

Do you agree or disagree with these requirements?

a) Requirement i. **Don't Know**

b) Requirement ii. **Don't Know**

Please give some reasons for your answers:

More clarity is needed on these proposals.

Any Land Register should be accessible as a GIS database including quantitative and qualitative data.

In some instances, it may be the tenant rather than the landowner who is in receipt of public funds; therefore there would be no incentive for the landowner to register with the Land Register of Scotland.

If it were indeed the case that it is e.g. the tenant who is in receipt of public funding but the landowner is not registered with the Land Register of Scotland, would this then affect the tenant's eligibility to receive said public funding?

There is also a need for clarity as to what is covered under 'public funding' in this instance.

Q28. Do you have any other comments on the proposals outline above?

It is acknowledged that in some local authority areas, the public can be uncomfortable with seemingly wealthy landowners receiving large amounts of public funding, particularly if the landowners do not live in the area on a full-time basis. There would therefore be a need for some criteria that does not compromise tenants, whilst at the same time does not eat into limited public funds.

Part 9: Land Use Tenancy

Q29. 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? **Don't Know**

Please give some reasons for your answers:

HOPS agree in principle with the idea that there should be range of land management activities permissible for tenants.

Greater transparency on the variety of agricultural activities and other land uses undertaken would be welcomed.

Whilst this may be one solution to allow for greater transparency around land uses, other solutions should also be explored to decide if this is the correct mechanism to take forward.

Q30. Are there any land management activities you think should not be included within a Land Use Tenancy?

HOPS are of the view that it would be more useful to have a non-exclusive list of land management activities. The monitoring body appointed could use their discretion to decide whether any proposed land management activities are sensible and in the long-term interest of sustainable development of the land.

There may also be a need to ensure that certain land management activities do not encroach too far on other rights – e.g. one local authority gave an example of an island where a rewilding project led to limits being imposed on public access rights, with signs put up by the landowner to try and stop people accessing the island.

Q31. 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? Don't Know

Please give some reasons for your answers:

HOPS are of the view that it would be more useful to have a non-exclusive list of land management activities.

The monitoring body appointed could use their discretion to decide whether any proposed land management activities are sensible and are in the long-term interest of sustainable development of the land.

Q32. 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 / Disagree / Don't Know

Please give some reasons for your answers:

Q33. 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?

Agree / Disagree / Don't Know

Please give some reasons for your answers:

Q34. How do you think the rent for a Land Use Tenancy should be calculated?

Q35. 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? Yes / No / Don't Know

Please give some reasons for your answers:

Q36. Do you think that there should be guidance to help a tenant and their landlord to agree and manage a Land Use Tenancy? Yes / No / Don't Know

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

Q37. Do you think there should be a process to manage disputes between a tenant of a Land Use Tenancy and their landlord? Yes / No / Don't Know

Please give some reasons for your answers and outline how this process could be managed:

Q38. 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 / Disagree / Don't Know

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

Q39. Do you have any other comments on our proposal for a Land Use Tenancy?

Please give some reasons for your answers:

Part 10: Small landholdings

Q40. Would you like to be kept informed about the Small Landholding Consultation for the Land Reform Bill? Yes

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

Q41. Do you agree or disagree with our proposal to explore:

- Who should be able to acquire large-scale landholdings in Scotland Don't Know
- 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 answers:

HOPS welcome any measures to enhance transparency around who owns, controls and benefits from Scotland's Land. However, we are unsure whether the proposals outlined above are the correct route to explore these issues.

Part 12: Other land related reforms

Fiscal and taxation

Q42. Do you have any views on what the future role of taxation could be to support land reform?

HOPS supports the case made by the Scottish Land Commission in their January 2022 report to investigate ways to progressively enhance the role of land in the tax base in order to support productivity and tackle inequalities. The report identifies an opportunity to tax land more effectively through reforms to a range of tax measures².

Community benefits and natural capital

Q43. How do you think the Scottish Government could use investment from natural capital to maximise:

a) community benefit

b) national benefit

- a) Investment could be used to maintain biodiversity on a sustainable level as well to contribute towards the Climate Change Agenda. There needs to be a clear understanding of embodied carbon within landholdings and how nature-based solutions can impact positively on social cohesion, health and wellbeing, economy, environment and biodiversity simultaneously on the same piece of land. There should also be links to carbon accounting and ECGs and green bonds.
- b) Investment could be used to establish a national reporting mechanism to enable local authorities to report their biodiversity status and their contributions towards the climate change agenda. There needs to be a clear understanding of embodied carbon within landholdings and how nature-based solutions can impact positively on social cohesion, health and wellbeing, economy, environment and biodiversity simultaneously on the same piece of land. There should also be links to carbon accounting and ECGs and green bonds.

It is important that the above should not be a mutually exclusive 'either/or' proposal, but another planning principle in that each case is judged on its merits.

Q44. Do you have any additional ideas or proposals for Land Reform in Scotland?

The principles published by Scottish Government on investment in natural capital have room to be more robust - unless community benefit aspects become a requirement of public funding or approval processes, there is a danger that any community benefit may not be realised in practice.

Part 13: Assessing impact

Q45. 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?

HOPS are of the view that the sustainability of Scotland's islands needs to be island-led, as they tend to be tourism hotspots not only for their natural beauty, but also for their culture, which includes agriculture and other land-based activities. The impacts need to be assessed separately in order to provide a clear line of direction – taking into account access to the islands, local produce, and access to mainland markets, etc.

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https://www.landcommission.gov.scot/downloads/61efa506191e2_Land%20Reform%20and%20Taxation%20-%20Advice%20to%20Scottish%20Ministers.pdf

Q46. 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?

HOPS will be interested to see how play sufficiency assessments interlink with land reform proposals.

Q47. 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)?

No comments

Q48. 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?

As noted under Question 30, the proposed Land Use Tenancy could potentially have negative impacts if incorrectly managed or if competing aims are not duly considered. One local authority gave an example of an island where a rewilding project led to limits being imposed on public access rights, with signs put up by the landowner to try and stop people accessing the island.

Any proposals for land reform should take a place-based approach to focus on creating a climate adaptive and resilient place – a focus on economic outcomes alone may well have unintended negative impacts.

HOPS would also reiterate that any potential positive or negative impacts on the environment should be included in proposed Land Management Plans.

Q49. 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)?

Isolation can be a factor for island communities when the ferries are unable to run due to adverse weather conditions or mechanical issues.

Q50. Are you aware of any potential costs and burdens that you think may arise as a result of the proposals within this consultation?

There may be additional costs associated with collecting and maintaining data for the land registry, managing the system and the additional duties.

Island communities tend to have to absorb higher costs, mainly due to associated transportation requirements.

Q51. Are you aware of any impacts, positive or negative, of the proposals in this consultation on data protection or privacy?

No comments