

Aim and approach

1. Which of the following best describes your view of the proposal's aim, to reduce the concentration of land ownership in Scotland?

Please note that this question is compulsory.

Fully supportive

Partially supportive

Neutral (neither support nor oppose)

Partially opposed

Fully opposed

Unsure

Please explain the reasons for your response.

Land is a crucial source of wealth and it should be used for the benefit of all of Scotland's people rather than a small number. Concentration of land ownership by a minority does not align with STUC's commitment to deliver a shift in wealth towards workers, families and communities in Scotland.

2. Which of the following best describes your view of a presumed limit on the amount of land that can be sold or transferred, or that any person can own?

Fully supportive

Partially supportive

Neutral (neither support nor oppose)

Partially opposed

Fully opposed

Unsure

Please explain the reasons for your response.

If we are to change Scotland's concentration of land ownership then measures like this are a proportionate and needed response.

3. If there is to be such a presumed limit, which of the following best describes

your view on setting this limit at 500 hectares?

The limit should be higher than 500 hectares

500 hectares is about right

The limit should be lower than 500 hectares

The limit should be different, in different circumstances

Unsure

Please explain the reasons for your response (including by suggesting what alternative limit you would favour, if appropriate)

As outlined in the consultation document, most people in Scotland own no or very little land, while the median agricultural holding in Scotland is just 9 hectares. 500 hectares is a reasonable definition of a large scale holding.

4. Which of the following best describes your view of having a statutory regulator with powers to subject proposed sales of land that are over the presumed limit to a public interest test?

Fully supportive

Partially supportive

Neutral (neither support nor oppose)

Partially opposed

Fully opposed

Unsure

Please explain the reasons for your response

A public interest test is a sensible way to address concentrated land ownership while retaining flexibility to allow sales above a limit should they be in the public interest.

Moreover, the number of annual sales of large estates, farmland and forestry is relatively small.¹ Applying a public interest test on these would not be particularly burdensome or time-consuming, given the importance/size of land being sold.

5. Do you agree that the Scottish Land Commission is the appropriate body to be given this regulatory role?

Yes

No – because a different body should be given this role (please specify below)

No – because no body should be given this role

Unsure

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https://www.landcommission.gov.scot/downloads/62543b9498bb1_Rural%20Land%20Market%20Insights%20Report%20April%202022.pdf

Please explain the reasons for your response (including by saying which body, if any, should be given this regulatory role)

The Land Commission is an established and well-respected public body with expertise in this area.

6. Do you have any comments on the proposed public interest test criteria (set out in the annex of the consultation document)?

The annex contains a number of areas worthy of consideration. Consideration could also be given to criteria within the National Performance Framework, the Oxfam Humankind Index and other wellbeing frameworks. In addition, Fair Work should be considered – including the extent to which new owners can evidence their support for Fair Work practices, including union access and recognition.

7. Which of the following best describes your views on the proposed voluntary arrangements (in Section 3E of the consultation document) which would assist those seeking to sell or transfer land over the presumed limit, to comply with the public interest test?

- Fully supportive
- Partially supportive
- Neutral (neither support nor oppose)
- Partially opposed
- Fully opposed
- Unsure

Please explain the reasons for your response

This could minimise time lost by those selling their land, only to find out at a late stage that the sale was not in the public interest.

8. Which of the following best describes your views on the proposed powers that would allow the regulatory body to apply a public interest test to existing land holdings above the presumed limit, and give it options for intervention (see section 4A of the consultation document)?

- Fully supportive
- Partially supportive
- Neutral (neither support nor oppose)
- Partially opposed
- Fully opposed

Unsure

Please explain the reasons for your response

While sales of land enable the public interest to be considered at a particular juncture, legitimate concerns about the management of land will emerge on land that is not for sale. The measures outlined seem a reasonable response to these issues.

Within the process we would like to see trade unions who represent workers in these land-holdings be able to raise concerns.

9. Which of the following best describes your views on making any sale or transfer of the whole or greater part of an island (or, possibly, a remote peninsula) subject to the public interest test (see section 5 of the consultation document)?

X Fully supportive

Partially supportive

Neutral (neither support nor oppose)

Partially opposed

Fully opposed

Unsure

Please explain the reasons for your response

Experience of land reform shows us that the dynamics of land ownership on Scotland's islands differs to Scotland's mainland. It therefore seems reasonable to make islands subject to the public interest test.

10. Which of the following best describes your view of the proposed policies on non-domestic rates and valuation (see pages 27 and 28 of the consultation document)?

X Fully supportive

Partially supportive

Neutral (neither support nor oppose)

Partially opposed

Fully opposed

Unsure

Please explain the reasons for your response

The STUC would support returning non-domestic rate setting powers to local authorities (albeit with ongoing equity considerations at a national level) and adding all land to the Valuation Roll.

Financial implications

11. Any new law can have a financial impact which would affect individuals, businesses, the public sector, or others. What financial impact do you think this proposal could have if it became law?

- A significant increase in costs
- Some increase in costs
- No overall change in costs
- Some reduction in costs
- A significant reduction in costs

X Unsure

Please explain the reasons for your answer, including who you would expect to feel the financial impact of the proposal, and if there are any ways you think the proposal could be delivered more cost-effectively.

Equalities

12. Any new law can have an impact on different individuals in society, for example as a result of their age, disability, gender re-assignment, marriage and civil partnership status, pregnancy and maternity, race, religion or belief, sex or sexual orientation.

What impact could this proposal have on particular people if it became law? If you do not have a view skip to next question.

Please explain the reasons for your answer and if there are any ways you think the proposal could avoid negative impacts on particular people.

Currently, Scotland's land is owned by a small group which is predominantly made up of white men. Democratising Scotland's land ownership would therefore benefit women and potentially a number of other protected characteristics.

Sustainability

13. Any new law can impact on work to protect and enhance the environment, achieve a sustainable economy, and create a strong, healthy, and just society for future generations.

Do you think the proposal could impact in any of these areas?

If you do not have a view then skip to next question.

Please explain the reasons for your answer, including what you think the impact of the proposal could be, and if there are any ways you think the proposal could avoid negative impacts?

Large-landed estates employ relatively few people and those workers they do employ are often on poorly paid, precarious, or seasonal contracts.² While not a panacea, diversifying Scotland's land ownership would, in all likelihood, create economic opportunities and more jobs than the current pattern of ownership.³

Moreover, many estates that are managed for shooting purposes, have limited positive impact on the climate. Democratising these estates and changing their purpose to housing, forestry, agriculture etc could have positive impacts on the climate

General

14. Do you have any other additional comments or suggestions on the proposed Bill (which have not already been covered in any of your responses to earlier questions)?

² https://www.landcommission.gov.scot/downloads/5dd7d807b8768_Research-Review-Concentrated-ownership-final-20190320.pdf

³ <https://www.landcommission.gov.scot/news-events/blog/addressing-scotlands-pattern-of-land-ownership-can-unlock-economic-and-community-opportunities>