**Response 008**

**Questions**

**Q1. Do you agree that Highlands and Islands Enterprise Community Land Unit is the appropriate body to provide advice to the KLTR on potentially suitable community groups? If not, who would you suggest and why?**

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| I am not qualified to answer this question in whole due to lack of experience with community bodies. However, I would offer the following unqualified observations (which may be easily answered or defeated by other respondents and stakeholders):   1. I think it is worth questioning initially as to how a community group or individual acting alone will identify if land is *bona* vacantia. The KLTR expects the usual suite of evidence required to satisfy them before they undertake due diligence. That is broadly acceptable but consideration should be given in the assistance a community will require. How will this evidence be ingathered? Will HIE support them in doing this, and are they qualified to do so? A strategy to advise enquiring parties should be devised, particular with regard as to who will finance a conveyancer carrying out a title review.   For the avoidance of doubt, I am content that a Stage 1B enquiring local authority or Stage 1A public body can carry out the legal review through panel solicitors or in-house to satisfy the KLTR.  In respect of community enquiries, whilst ScotLIS’s citizen version and the work of Registers of Scotland ownership search team is no doubt useful, I would suggest that recourse to a solicitor may be required by an individual/community group, particularly when the title is unregistered and remains recorded in the GRS. For a complex Sasine title, how will an individual or community body fund professional legal fees or a professional title researcher? Will HIE direct them to an appropriate solicitor? Will the local authority solicitor or other Stage 1 public body solicitor/their panel carry this out for them?  To avoid speculative enquiries by a community group being dismissed outright at the Initial Considerations stage, the KLTR will need to direct a community group to services to identify the status of the land in question. It may be that this is channelled to HIE but in turn I suspect this will likely need the services of a legal professional or title researcher.   1. There is now a range of group of organisations providing advice and support (DTAS/COSS, HIE CLU, Scottish Government Community Land Team, Social Farms & Gardens Community Land Advisory Service Scotland etc.) to community groups. This range of support is obviously welcome but the coherency of advice is at risk as a result. The organisation chosen to collaborate with the KLTR (“the **advocate body**”) must be capable of providing the necessary advice required from the initial request of *bona vacantia* to the KLTRto onward support and setup of the life of the community’s ownership. 2. The nomenclature of Highlands and Islands Enterprise is unfortunate and perhaps will fuel an initial misconception to North-East, Central Belt and Lowlands communities that the OPTS is not available to them or meant for them. That can obviously be dispelled relatively easily but the point remains. I note that HIE’s current project list on its website does not appear to show any assisted community assets in the Central Belt or Lowlands [here](https://www.hie.co.uk/support/support-for-community-organisations/community-assets/routes-to-ownership/assisted-community-owned-assets/?currentPageId=3663&page=1&showAllResults=true) (link). 3. If HIE is the appropriate body in terms of coherency with the other Community Right to Buy options, then it should so be recommended. I reserve my opinion on whether it is appropriate for a government entity constituted by the Scottish Ministers to be providing independent advice to a community to then in turn treat with the KLTR or other Scottish Ministers public body/local authority (depending on the circumstances). |

**Q2. Do you agree that a valuation and other reports undertaken by the KLTR are sufficiently independent to avoid duplication of cost for all involved in the OPTS? If not, why not?**

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| A surveyor is an independent professional therefore the commission by the KLTR should achieve this, provided the reports are suitably addressed for the benefit of the purchaser (community group or Stage 1A and Stage 1B public body) to rely upon. Letters of Reliance on the reports should be provided by the consultant to the transferee in that respect. |

**Q3. Do you think three months for the local authority to decide whether or not it wishes to take ownership of an ownerless property is reasonable? If not, how long would you suggest and why?**

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| Given the natural pace of a local authority, and the current realities we live in, I would suggest 6 (six) months to allow the proposal to do the rounds between various departments (planning, building control, regeneration services, public realm, legal services, committees, full Council etc.). |

**Q4. Do you agree that the above process is reasonable and workable? If not, how would you improve the process?**

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| * **Stage One Process comments:** * **Stage 1A - Transfers to SPFM The Trawl bodies:** Given my comments above for the timescales for local authorities, I express a concern as to whether one month is appropriate for Stage 1A transfers. In the same vein, I would suggest 3 (three) months to allow the flexibility for internal discussions within larger organisations such as Transport Scotland or the NHS CLO and Health Boards. It should be remembered in the meantime that if a community proposal is in view, that will take time to constitute an appropriate community body and raise funds. The process should not be unduly rushed. However, I note the SPFM prescribes 1-month normally. I would suggest obtaining permission for derogation from the normal SPFM requirement. The *bona vacantia* property is not known to the public sector before acquisition so it may be that the property will need to be investigated and the reports obtained by the KLTR reviewed by appropriate technical staff before, in turn, that public body comes to a decision to note interest. I would welcome the views on the SPFM applicable organisations. * **Stage 1B - “That failing” transfers to Local Authorities:** * Where a property is identified by the local authority for regeneration and that local authority approaches the KLTR, it seems unnecessary for the property to have to go through the Stage 1A Trawl Process. It should be clear that if a local authority is the enquiring party, the local authority need not be prejudiced by the property having to go through the Stage 1A SPFM Trawl and can go straight to a Stage 1B “That failing” transfer. Offering to a Stage 1A national organisation when a local authority has already noted interest offers a conflict between a national interest and local interest.      * Where a property is not known to the local authority or not within wider regeneration plans, I express a concern about the appetite for local authorities to take title to *bona vacantia* properties and would welcome local authority views on this. This is particularly where the property does not fall within a regeneration or development objective of the local authority. The [work commissioned](https://www.landcommission.gov.scot/downloads/5dd676ab97618_Phase-One-Report-Ryden-June-2019-Final.pdf) (link) by the Scottish Land Commission notes half of abandoned and derelict sites are in public ownership, indicating that public bodies are already sitting on properties which could be brought back into productive use. From town hall meetings I have attended hosted by the Scottish Land Commission, particular local discontent was noted against local authorities towards the maintenance of their current assets. * What I suggest may happen in practice (and would welcome the views of local authorities on) is that a local authority will not take title unless it is already known to them. Equally, if a community proposal is not in view (or in its infancy/genesis only) then the local authority may be unlikely to take title. If the property is unknown and they do take title (which seems highly unlikely), then the property will likely just sit sterilised on their asset register until a developer approaches. As the KLTR acknowledges, there is a lack of financial incentive to take on problematic buildings, and if a property is taken to sit on an asset register, further structural or environmental problems may arise leading to the total loss of a building. * I would submit housing associations and Registered Social Landlords should also qualify for the OPTS rather than having to go through the local authority, who would act as a middleperson. For example, Glasgow City Council no longer employs council housing as this was transferred to Wheatley Homes Glasgow so it would be interesting to know their appetite to take title to derelict *ultimus haeres* or other residential properties directly. Given current social and affordable housing demand, if a residential property or potentially residential property building/site, is identified as *bona vacantia*, every effort should be made for it to be regenerated for the public benefit and brought into social housing use before being offered to a community body under Stage 2 or at a “Stage 3”public roup. The KLTR should be a partner to that objective in this regard. * The question of eligibility of local authority Arms-Length External Organisations (ALEOs) and other partnership structures under **Stage 1B** should also be clearer. Many public functions are now operated by ALEOs such as leisure and cultural facilities which may not fall within the traditional definition of ‘local authority’. The local authority may wish the ALEO to have title and then lease or sublet the subjects to community body as a cultural or sport asset. I appreciate Best Value considerations will play an impact here but I would suggest obtaining derogations from the SPFM. I would welcome the view of ALEOs or other bodies where the local authority is a partner of or trustee for. * Equally, I would suggest consideration of whether NGOs/Charities & SCIOs should be entitled to make use of the OPTS such as the National Trust for Scotland or other cultural or social NGOs that may not be regarded as a community body for the purposes of Stage 2. In turn these bodies may have conditions imposed on them to provide the asset for the community benefit. I appreciate Best Value considerations will also play an impact here but again I would suggest obtaining derogations from the SPFM. I would welcome the view of NGOs. * **Stage 2 Transfers** * I am agreed on the principle of subsidiarity for the OPTS and the decisions concerning the property should be taken at the most appropriate level. I note that the KLTR will expect the consent of the local authority to a community proposal, which is in principle welcome. However, further clarity would be welcome on the nature of the consent, whether as a matter of planning consent or some other formal written consent by the relevant department within the local authority (Regeneration, Parks & Environmental Services etc.). To rely on planning consent may be difficult within the 2006 Act time constraints, given how long a planning application may take to come to determination. * Whilst I appreciate the KLTR’s position to promote local discussion and collaboration, I believe more could be done to facilitate this by the KLTR office itself. From the outset of the policy consultation you note the role HIE (or other advocate body) can play. However, the involvement of the advocate body seems to absent within the specific mechanics of Stage 1 and Stage 2. It is arguable that more could be done to ensure HIE or other community advocate body are aware of an OPTS property from the outset, such as a formal notification procedure, detailed proposals would be welcome as to what stage HIE are notified. If a simple Stage 1A transfer to another SPFM public body (for example, Transport Scotland as the property concerns a small tract of roadside etc.) there would arguably be no need to involve HIE to notify and involve community bodies. I reserve my opinion on whether that would be within the spirit of the OPTS but if it brings land into productive use then so be it. * Equally, if a property is then proposed to be dealt with under Stage 1B, how is the existence of the proposed transfer notified to local communities directly to ensure that they input to a local authority that they would be interested in an onward transfer? It is submitted that further thought should be given as to whether there is a need for enhanced notification procedures for property eligible under the OPTS and information-sharing with the chosen community advocate body. A community must be involved at the earliest possible opportunity to facilitate the objectives the OPTS seeks to achieve. * The issue that may present itself is the OPTS deals with a property under Stage 1B and yet the local community are unaware of the proposed transfer to the local authority. The KLTR should not facilitate silent transfers to local authorities but equally I recognise you do not want to handle completing claims and become the arbiter of local interests. A reasonable approach would be to issue a simple *pro-forma* notice by the KLTR to the community council or advocate body (or local authority if a Stage 1A transfer to a government body) to make them aware of the existence of the property and the proposal to be dealt with under the OPTS. No further action need to be provided by the KLTR and the notice can direct the local community to contact HIE/advocate body and the local authority for further input and support. This would align with other notification procedures such as local notification in the planning process. * Stage 2 is premised that there *is* a community body in view. If there is no live proposal then, as the KLTR acknowledges, there is a risk that the property sits within the KLTR’s purview beyond the statutory disclaimer longstop, forcing a disclaimer or quick roup. This is obviously a concern given your consultation question No. 7. * **Stage 3: Public roup or disclaimer**  It would be unfortunate if a disclaimer is issued by the Crown and then a community body comes along at a later date. This has happened before, such as the Culduthel Woodlands scenario. The law of positive prescription and vesting orders by the courts may serve as alternatives (if unsatisfactory, given the length of time that a prescriptive claimant may have to wait to receive a full title sheet, and the cost of a vesting order court application). However, that is the law, and what the KLTR has open to the office in the public interest. As much notice as is possible should be given by the KLTR to communities that there is a *bona vacantia* asset in their community, as noted above.If the land is sold at public roup, and a community body materialises at a later date then it is open to the community body to carry out a Community Right to Buy against the new owner depending on the property and the community’s proposals. This, in my opinion, is a reasonable outcome.However, both outcomes reinforce the need to capture the property and engage the community as early as possible. If there is no appetite at the time that the KLTR becomes aware of the property, then property should not be forced onto a community if they do not want it. |

**Q5. Do you agree that the property transfer value for OPTS should be at “nominal value” as described above? If not, what value do you think should apply and why?**

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| Yes but subject to personal and real conditions. |

**Q6. Do you think the KLTR should place conditions on the transfer of OPTS property to ensure the intended benefits to local communities are delivered?**

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| Yes, it would be advisable to always put in place personal real burdens for the benefit of the Scottish Ministers (or local authorities) as a matter of course to ensure the property is used for the public benefit irrespective of whether a Stage 1B or Stage 2 transfer (Stage 1A will be problematic as a matter of *confusio* if the Scottish Ministers entity takes title to the property).  There will always be a risk that a party sells on that defeats the objectives of the OPTS, a personal real burden is a simple mitigating factor. The nature of personal real burden will depend on the circumstances but it should be within the power of the KLTR to require the reservation of Conservation Burdens, Climate Change Burdens, Healthcare Burdens, Rural Housing Burdens or Economic Development Burdens as appropriate. If appropriate, the Economic Development Burden can incorporate clawback or overage provisions in place of a Form B Standard Security (which can be problematic for later secured lenders or the public sector generally).  Well known examples are given by A. Wightman of the abuse of Common Good property where common good property was mismanaged by local authorities and sold to be used for private benefit with no oversight. A residual power should remain within the title to the Scottish Ministers to intervene, even if it is never needed. A personal real burden requiring a Deed of Discharge or *in gremio* consent to a Disposition is not unduly onerous and is analogous to the simple situation of a Bank granting a Discharge of a Standard Security in the expectation that their loan will be redeemed.  I note the proposal that the KLTR will not police local authorities and public bodies received title, but a simple personal real burden enforceable by the Scottish Ministers generally (rather than the KLTR or Crown as seller) may not need the KLTR to be involved personally. A safeguard can be put in place that can be later enforceable by another relevant agency or directorate of the Scottish Government (eg: Historic Environment Scotland or NatureScot). I am apprehensive of the proposal that the KLTR should rely on public body accountability or local community members generally given current financial practicalities. I would welcome the views on community groups and their experience of local authorities in managing existing assets in this regard. |

**Q7.**  **Do you think a recognised public authority should retain a property to allow an appropriately constituted community body to raise the necessary funds, etc.? If so, should a timescale be set for raising the funds?**

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| I am apprehensive about this but would welcome the views of COSLA, the Scottish Land Commission and local authorities. There is a risk that a building simply moves from *bona vacantia* derelict property to local authority or ’hold agent’/holdco derelict property and there is no outward change for the public benefit if the community proposals do not materialise.  However, in principle, having a designated authority to hold title to property that may be able to be act as a holding pen for potentially useful assets for community ownership is welcome. A deadline would be helpful to ensure that there is not further productive land sterilisation, perhaps 3 years to allow for formation of an appropriate corporate body, charity status (if appropriate) being obtained, and then raising of purchase and management funds. If an asset is transferred to a holdco, consideration should be given as to whether the community could simply opt for a Community Asset Transfer instead and whether this is a favourable outcome or undermines the OPTS. Indeed, if the KLTR could simply just transfer everything to a holdco to be eligble for a Community Asset Transfer then that would appear to obliviate the need for an OPTS.  In any event, if the community aspirations fails to materialise, consideration should be given as to whether the title should remain with the holdco or the property sold privately at roup (abandonment of title to force return the property to the Crown not being an option following the decision in *Scottish Coal*). Whether an existing public body will be willing to do this, or whether the Scottish Ministers may have to constitute a new “community regeneration agency”, remains to be seen and is not yet fleshed out.  One pauses for thought (under express reservation that this is a mere high level and unfounded thought) to consider whether a restored company might challenge the ‘holdco’ method and what merit that challenge may have.  For example, the KLTR receives notice of a dissolved company’s interest in a vacant lockhouse beside a canal. A community is interested in the site as a community café and events space but is still in the throws of establishing a relevant corporate structure to allow them to eventually take title. The statutory disclaimer longstop is approaching so the KLTR decides to transfer to the holdco to preserve the community’s position, the statutory disclaimer longstop acting as bar to the Crown’s right to reject (and therefore entitling a restored company to retake the property). The dissolved lockhouse company’s former shareholders gets wind of the community’s plans and decides that they want to restore the company and convert the lockhouse instead, now seeing this as a viable opportunity to convert into luxury residential apartments at a profitable return. They restore and seek to vindicate their title, to discover that the company is no longer the owner of the lockhouse under operation of Section 1034(2) of the 2006 Act, the holdco is now the owner. Can the company challenge the transfer to the holdco and reduce the transfer to the holdco in any way as an attempt to escape or subvert the statutory Crown disclaimer? In theory Section 1034(2(a)) of the 2006 Act should reassure the KLTR that this will not be the case but given the holdco method appears subversive, the KLTR should be satisfied they have mitigated any risk of challenge by a restored company on this proposed approach (particularly a human rights challenge under A1P1 or other rules of administrative law). I would welcome the view of counsel in this respect. |

**Q8. Do you think the OPTS should apply to all properties as described or should it be restricted to certain types of properties? If the latter, which types?**

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| There should be no restriction on the nature of the property. I anticipate the terminology is only for ownership, but for the avoidance of doubt registered long leases or short leases should not fall within the ambit of the OPTS. That would be unworkable in practice as it would thrust a Stage 2 community group or Stage 1 public body on a landlord (assuming no alienation clause in the lease itself). |

**Q9. Do you agree that the above proposals provide an opportunity for ensuring community interests are considered as early as possible? If not, why not?**

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| Agreed that there should be duty to consult the local authority or other local body in the first instance. I am less persuaded that there should be a duty to “obtain their support” at the initial stages, proposals may not be entirely flushed out to win the support of a local authority. If carried through, what evidence of support is required, a formal letter of support etc. for the KLTR to commence the OPTS?  Additionally, I am confused as to how HIE as the community advocate body then fits into the initial notification process. There is no mention of signposting the community to HIE, just to the local authority. Clarity on the role of HIE or other community advocate body would be welcome.  I note that contacting the relevant local body in the first instance will avoid triggering the disclaimer. If a well-spirited community person contacts the KLTR by email with attachments of the requisite information in ignorance of the OPTS conditions, will this not trigger the disclaimer longstops in any event? This seems slightly unworkable in practice and something the KLTR cannot control, however unfortunate the consequences may be.  Agreed of the precedence of the public interest over private interest. That is the essence of Scottish land reform. |

**Q10. Do you agree that the above criteria should apply to the OPTS? If not, what criteria do you think should or should not apply and why?**

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| These are broadly agreeable. I make a few comments on each class of information:  **Notifier Information**   1. **Initial considerations:** See OPTS criteria comments below. 2. **Property details**: Agreed, the circumstances of the owners would also be helpful at this stage to avoid unnecessary consideration to then identify the property is not *bona vacantia*.   **OPTS Criteria**  On the basis that the KLTR is assessing *prima facie* eligibility for the OPTS, and the the KLTR is a legal office with limited resources, I would make the suggestion that the KLTR delegates this policy task to the Community Land Team within the Scottish Government given they have better experience in reviewing community land proposals as part of the community rights to buy. A simple letter of approval could be produced by the SG Community Land Team to satisfy the KLTR that there is *prima facie* evidence that his/her office can commence the OPTS. I question whether it is appropriate for a local authority to fulfil this role, questioning what experience they have to assess merits, although their consent as the local body is invaluable.  If felt appropriate, the Community Land Team could also later look at the substantive proposals to assess long term viability of the community proposal as the transfer nears conclusion, albeit if the local authority is a consentor under Stage 2 this may not be felt necessary. That would avoid the need for reviewing and evaluating proposals in detail and allow the KLTR to deal with the process more mechanically as a conveyancing professional. Overall, there must be a coherent approach, delegating assessments to the Community Land Team would ensure that there (i) a central approving body for initial OPTS criteria rather than varying local authority attitudes; and (ii) coherency with the other community right to buy options.  I would welcome the comments of community ownership advocates in this area but I question the reliance placed on local authorities where other government agencies may be better placed to assess OPTS criteria in this regard. Precedent with the Community Asset Transfer framework would be helpful to understand what role the local authority has played, and can play. |

**Q11. Do you agree that the OPTS should ensure the wider public interest is considered before private interest? If not, why not?**

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| Yes. However, where a Stage 2 transfer is required, the KLTR will likely be drawn in more to these questions given the local authority acts as a consentor only. The KLTR should be clear that local authority or other body consent means *prima facie* the transfer is in the local interest. The question remains at to where there is competing public interests, for example if a community body wishes to acquire alongside a public sector body. |

**Q12. Do you think the public interest is defined reasonably for the purposes of the OPTS? If not, how should it be defined?**

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| Yes. Public interest is a notoriously difficult term to define objectively, a wide discretion is appropriate. |

**Q13: Do you agree that the KLTR should take a high-level approach to sustainable development issues, as above, in order to allow further scrutiny and transparency at local level? If not, why not?**

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| Yes following the principle of subsidiarity to delegate to the local authority. If appropriate, by also imposing personal real burdens in favour of the local authority or NatureScot. |

**Q14:** **Do you consider there are specific circumstances in which the KLTR should never deal with dissolved company property when a company still remains within its 6-year restoration window?**

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| This is a difficult question and one which I would welcome the views of corporate advisors and insolvency practitioners on. If the company is restored midway through an OPTS transfer, this will kill the transfer. A dissolved company shareholders or insolvency practitioner might see that property they let fall as *bona vacantia* as a viable asset in light of a community plans and seek to restore on that basis.  Tentatively, I think this question should be treated on the inverse, i.e.: the general rule should be the KLTR does not deal with <6-year dissolved company property except where there is some form of written personal bar/settlement agreement precluding the shareholders from seeking restoration. An extremely cautious approach should be employed but an outright ban on all former company land within 6 years seems too restrictive. |

**Q15. In addition to the above, do think any other financial controls or safeguards are required? If so, please describe how and why.**

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| I am not a regulatory lawyer so I regret I am unable to offer an informed view on this. The view of competition lawyers, the Auditor General, or other regulatory officials would be welcome. With this said, the proposals outlined seem fair in the circumstances. |

**Q16. Do you think the KLTR’s approach to liability and risk is acceptable? If not, how could this be improved?**

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| This is broadly agreeable given the legal framework. |

**Q17. Are there any other ways you think the OPTS may be monitored? If so, in what way?**

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| These are broadly agreeable bar the last statement. The reliance on local democracy seems misplaced here and as noted above, a residual power should remain with the Scottish Ministers to intervene. Alternatively, legal powers should be given to local authorities or other bodies through appropriate personal real burdens. I would welcome the worked experience of community bodies on their interaction with local authorities.  If a holdco agency is created for the purposes of holding potentially community assets, then oversight should be by a board comprising of membership of appropriate community advocate bodies, NGOs, lay members and the KLTR. |

**Q18. Do you agree that penalties for non-delivery of aspirations are unnecessary, as above, and that local accountability should be sufficient to ensure delivery of agreed aspirations?**

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| I broadly agree with the proposition, the KLTR cannot force a community to act as an instrument of the state in delivering objectives. However, simple checks and balances should still be enabled through use of personal real burdens. Local accountability is a fantastic prospect but I question whether the current local authority structure and workload can deliver this effectively. The scandals involving the common good funds is an excellent example of this. I would welcome the view of funders in this area such as the Scottish Land Fund or others, who will put in place key delivery targets as part of tied funding. |

**Q19. Which of the further measures above do you think should be applied to the OPTS?**

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| **Taking the proposals in turn:**   1. **Limiting the scheme to £0.5 million** – Agreed. 2. **Having an overall financial limit** – Disagree for the reasons the KLTR gives. 3. **Excluding properties <6 years dissolution** – Agreed for the reasons stated above and below at n.20. If evidence is provided that personally bars the shareholders or directors from restoring, then the property could then be dealt with. Generally <6 years is too soon to initiate the OPTS. 4. **Passing risk** – Disagree for the reasons the KLTR gives. |

**Q20. Do you think properties within the 6-year restoration window should be excluded from OPTS or do you agree that a criteria-based policy approach, as described above, is the best way of addressing this?**

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| I am very concerned by this risk. I am minded to agree that all <6 year dissolved company should be excluded bar compelling evidence that the directors have renounced all intention to restore. The only upshot to this would be to allow a community time to commence the necessary preparatory work and develop sound proposals to allow an expedited transfer upon expiry of the restoration longstop. |

**Q21. Are there any other measures you think should be taken to safeguard those involved in the OPTS process?**

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| None to my knowledge at this stage. |

**Q22. 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?**

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| I regret I am unable to offer an informed view on the island communities’ impact of the proposals. |

**Q23. 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?**

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| I regret I am unable to offer an informed view on the young persons’ impact of the proposals. |

**Q24. 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)?**

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| I regret I am unable to offer an informed view on the equality impact of the proposals. |

**Q25. 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?**

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| I regret I am unable to offer an informed view on the environmental impacts of the proposals. |

**Q26. 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)?**

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| I regret I am unable to offer an informed view on the socio-economic impact of the proposals. |

**Q27. Are you aware of any potentially unacceptable costs and burdens that you think may arise as a result of the proposals within this consultation?**

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| I regret I am unable to offer an informed view on the financial impacts of the proposals. |

**Q28. Are you aware of any impacts, positive or negative, of the proposals in this consultation on data protection or privacy?**

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| I regret I am unable to offer an informed view on the data protection impacts of the proposals. |

Please email to the KLTR Policy Team’s mailbox at [**Policy@KLTR.gov.uk**](mailto:Policy@KLTR.gov.uk)**.**   
You can save and return your responses while the consultation is still open but please ensure that consultation responses are submitted before the closing date.

If you are unable to respond by e-mail, please print and complete the Respondent Information Form and send it by post to:

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