Aberdeen & Grampian Chamber of Commerce (AGCC) is North-east Scotland’s leading private sector, member-focused, business organisation. We are affiliated to the British Chambers of Commerce and represent more than 1,350 businesses with almost 130,000 employees in the region.

The Chamber represents various sectors with an interest in this consultation, including property, legal services, tourism and food and drink. Some of our members are landowners, and others provide advice and support to landowners in the region through valuations, legal support and transactions.

AGCC therefore welcomes the opportunity to submit our members’ views to the Committee.

In our response to the Scottish Government’s consultation, opened in December 2014, we voiced our members’ concerns with the proposal to limit land ownership to entities registered in the European Union and the restrictions on the amount of land that may be owned. We therefore welcome their removal from the proposed Bill, as these measures could have been ineffective at best and, at worst, impact Scotland’s competitiveness.

The Chamber also supported the aims of providing clear and up-to-date information about land, its value and ownership. However, members are of the view that the Bill does not sufficiently consider the positive contribution which the current structure of land ownership and management delivers to the national economy. Specific sections of the Land Reform Bill still merit further discussion.

Firstly, the Bill provides for a “land rights and responsibilities” statement, to be written by ministers. Chamber members are concerned that the statement would not acknowledge that most rural landowners are already using their property in a socially responsible way. In addition, the Bill should specify whether this policy will only apply to certain types of landowners and land. As this proposal could constrain landowner’s freedom to make commercial decisions, particularly in urban areas and the housing sector, the Chamber recommends that it is not implemented.

The Chamber takes a neutral position on the creation of a new Scottish Land Commission, as members’ opinions were divided on this proposal. The Commission could have a positive impact by appointing members with expertise on land-use matters to develop evidence-based policy. However, it should remain separate from government as an independent body, preferably with a Board that reflects the large range of stakeholders affected by this issue. Although the Bill states the remit and structure of the proposed Scottish Land Commission, further engagement with stakeholders is necessary before it is created, to provide clarity on its wide-ranging powers and objectives.

Finally, the proposed extension of the right to buy would give community bodies and “third party purchasers” the right to buy land to further sustainable development. The Bill does not provide a clear definition of “sustainable development”, using vague...
terms in section 47(2) such as “public interest” and “significant harm”. Chamber members would not currently support this proposal.

It is important that the Government continue consulting with Scottish landowners and that they also address ongoing problems with the planning system as the Land Reform Bill is scrutinised. We look forward to following the discussions of the Bill in Parliament after the summer recess, and hope further consideration will be given to the sections we have highlighted in this letter.

If you wish to discuss the impact of the proposals for businesses in the North-east of Scotland, please contact Irina Bonavino at irina.bonavino@agcc.co.uk or 01224 343936.