



SCOTTISH LAND COMMISSION
COIMISEAN FEARAINN NA H-ALBA

Meeting of the Commissioners

Tuesday 1st December 2020, 9:30am
By Video-Conference

A G E N D A

Item no	Item	Paper no	Action	Lead
	Welcome/Apologies			Andrew Thin
	Declarations of Interest			Andrew Thin
1.	Minutes of previous meeting 3 rd November 2020 Matters Arising: Key Performance Indicators ARC Paper	1 2	For agreement	Andrew Thin
2.	Concentrated Land Ownership Proposals	3 (Annex A: confidential pending publication)	For decision	Hamish Trench/Shona Glenn
3.	Land for Housing – emerging recommendations	4 & Workshop presentation to be given at meeting	For discussion	David Stewart / Shona Glenn
4.	Tenant Farming Commissioner Update	5	For information	Bob McIntosh / Sarah Allen
5.	AOB			Andrew Thin

This meeting will be followed by a stakeholder meeting with Community Land Scotland 12.00 – 1.00

Actions from Board Meetings - Update of actions to date

Action number	Date Raised	Context	Action Detail	Responsible	Date Required	Date Closed	Comments
20110301	03/11/2020	Commissioners' Meetings	Hamish to add agenda item on KPIs to the December Commissioners' Meeting under matters arising	Hamish	01/12/2020		Item included in the agenda for 1st December
20110302	03/11/2020	Organisational Processes	Posy to email the Cyber Incident Response Plan to Commissioners	Posy			This has been emailed to Commissioners
20110303	03/11/2020	Budget	Hamish to email the Commissioners with clarity on the payroll expenditure.	Hamish			Hamish provided clarification on payroll expenditure 5/11
20110304	03/11/2020	Commissioners' Meetings	A discussion on impact evaluation in relation to performance monitoring to be included in the forward programme of board meetings.	Hamish			Discussion session to be included in 2021 board meeting programme



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Audit and Risk Committee 2 November 2020

Performance Monitoring

Purpose

To agree KPIs to monitor the Commission's performance for 2020-21

Background

The Audit and Risk Committee agreed to key performance indicators (KPIs) for 2019-20 to monitor organisational performance on an annual basis. Those KPIs looked at performance across key business areas of finance, staff wellbeing, delivery and communications.

The Commission's performance against those indicators was reported on in the 2019-20 Annual Report. Following the audit of the annual report and accounts, Audit Scotland recommended the KPIs were tailored to the objectives in the Commission's Strategic Plan.

Measuring success

The Commission published a new strategic plan in September 2020, which detailed indicators to use over the three year period to measure success. The indicators measure performance over the period of the plan and this is to be distilled down for annual performance reporting.

The below table looks at the KPI as stated in the strategic plan and the measurement of success on an annual basis to ensure we are working towards achieving the three year target:

Business area	Key performance indicator (2020-23)	Measurement (2020-21)
Providing advice to Government on key areas of work	Delivered 95% of outputs as identified in the annual business plans for the three-year period.	Delivered 92% of outputs identified in the annual business plan. Percentage number of outputs delivered and completed as detailed in the annual business plan
Engagement on land rights and responsibilities	Measured an increase in the use of Land Rights and Responsibilities	Establish a baseline and measure progress with a set target (to be

	<p>Protocols through case work and stakeholders</p> <p>Adoption of the Land Rights and Responsibilities Statement by public bodies</p> <p>Increase in the awareness and level of engagement in decisions relating to land from the 2019 baseline figure for the community engagement surveys</p>	<p>developed by the Good Practice Team).</p> <p>Survey to take place in 2021</p>
Stakeholder feedback on impact of Commission's work	<p>Project evaluations identify impact and change in approach by stakeholders as a direct result of the Commission's work</p>	<p>Post evaluation surveys identify over 60% of respondents as acting on what they have learnt through event/engagement.</p>
	<p>Increase of 15% by 2023 of stakeholders identifying improvements and better outcomes in their organisation and practice as a result of the Commission's areas of work from the baseline of the 2019 perceptions audit.</p>	<p>Next audit 2021. Communications KPIs identified in the communications strategy and reported on annually.</p>
Staff wellbeing and satisfaction	<p>Increase of 15% by 2023 of staff feeling valued and recognised for their work from the 2019 baseline in the annual staff survey</p>	<p>Increase of 5% of staff feeling valued and recognised for their work from the 2019 baseline in the annual staff survey</p>
Financial performance	<p>End of year outturn to be within 2% underspend of total allocated budget by 2023.</p>	<p>End of year outturn to be within 4% underspend of total allocated budget.</p>

It is important that the Commission is able to monitor and report on performance in delivery of its annual business plan and progress is reported in the annual report.

The progress on the delivery of the annual KPIs will contribute to monitoring and impact reporting towards the Commission's outcomes.

The Committee are asked to approve the KPIs.

Posy MacRae

8 October 2020



SCOTTISH LAND COMMISSION
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Commissioners' Meeting 1st December 2020

PAPER 3

LEGISLATIVE PROPOSALS TO ADDRESS ADVERSE EFFECTS OF CONCENTRATED LAND OWNERSHIP

Purpose: The purpose of this paper is to update Commissioners on the progress in developing proposals for legislative reform to address the adverse effects of concentrated landownership and agree next steps prior to publication.

Since October further work has been undertaken to address feedback received from Commissioners and others on the draft report considered at the October Commissioners meeting and the current draft is attached at Annex A. Further discussions have also taken place with the Scottish Government about how to ensure that the work is most effective in informing future Parliamentary and stakeholder discussion.

Based on feedback received we now propose to broaden the narrative of the paper to set the proposals within the wider land reform context. The intention behind this is to help better explain how the proposals are a natural next step in Scotland's land reform journey. This requires a broader discussion in the paper that does not assume detailed prior knowledge of our previous recommendations and publications.

This change should help position the publication well to inform wider public and Parliamentary discussion. Broadening the narrative in this way would also provide us with an opportunity to connect the proposals directly into the wider land reform debate that is currently ongoing at a UK level.

To achieve this we intend to further develop the report as follows:

- Adjust the introduction section so that it sets the scene not just in relation to the Land Commission's scale and concentration investigation, but within the wider context of land reform, including the most recent phase of land reform legislation.
- Reframe section two of the report (policy context) as a background/context section to explain the land reform journey so far (including the Land Reform Review Group, proposals for a cap on ownership, various rights to buy, the Land Reform Act, the evolution of the TFC and introduction of the LRRS) and to set the current proposals within this story.
- Include additional narrative to explain the gaps in current legislative provision that the proposals are seeking to fill. This will include discussion about how far the introduction of the various legislative rights to buy have helped to address ownership reform, with specific reference to the potential of Part Five Sustainable Development right to buy and explain that those proposals address particular circumstances where communities want to take ownership, but not wider risks of concentrated landownership. It will also include an expanded

discussion of our work on Land Rights and Responsibilities to explain why this is expected to address some but not all of the issue.

- Incorporate an additional section to summarise the key learning from the various pieces of research that the Commission has undertaken over the past three years that have influenced these proposals.
- Expand the narrative around the human rights and legal context, making it more discursive and drawing on material from the Commission's previously published Landlines paper to tell the story of ICESCR context and international obligations.
- Further internal testing of the logic behind each step of the proposals to ensure that they stand up to scrutiny.
- Incorporate a conclusions and next steps section that explains how the paper is expected to inform future consideration by Parliament and stakeholders.
- An amended executive summary that reflects the above.

We will require additional time to complete this work but aim to complete this by the end of January and anticipate being in a position to publish the paper shortly thereafter. Commissioners are invited to consider the draft at Annex A and agree the revised approach for publication

Hamish Trench and Shona Glenn

December 2020



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Commissioners' Meeting 1st December 2020

PAPER 4

TITLE: Land for Housing & Development Progress Report

Purpose: To update commissioners on progress on the Land for Housing & Development workstream and to outline key findings from each of the workstreams. To provide background for a discussion on the main findings and recommendations of the review and how we disseminate these.

Background

Land for Housing & Development has been a core area of work for the commission since its inception. There is widespread concern in Scotland about homes being unaffordable for many and not enough new homes being delivered.

The coronavirus pandemic has sharpened the focus on quality of housing and place¹. The commission's work aims to identify ways in which we can alter and influence the way that land for housing and development is identified and brought forward with the goal of delivering more homes and better places.

The review follows previous work by the Commission on Land Value Sharing and Public Interest Led Development which culminated in Advice to Scottish Ministers in 2019². The Advice highlighted the need for a move to a more plan led approach to development with the public sector taking a pro-active role in initiating and driving forward development. It stated that

“the Scottish Land Commission intends to work with stakeholders to consider what changes would be required to address the deficiencies created by Scotland's market driven approach to land allocation and move toward a less speculative system.”

Review of Land for Housing & Development

The Review consists of the following elements:

- Land and Housebuilding;
- Land for Rural Housing;
- The Benefits of Early Community Engagement to Development;
- Case Studies – Delivering More Homes and Better Places; and
- Land, Housing and Placemaking in Europe.

¹ Samuels et al (2020); The Impact of the Pandemic on Housing & Placemaking (ongoing research), CaCHE

² Glenn (2019); Advice to Ministers – Options for Land Value Uplift Capture, Scottish Land Commission

Review: Main Findings

Land and Housebuilding

The research found that there is not evidence of land banking of sites with planning permission to achieve excess profits. Land further back in the system, however, requires investigation. Our research also found that while development land prices and existing house prices influence each other, it would take a large increase in the amount of land released for development to reduce house prices.

Most significantly the reports found that housebuilding is characterised by significant elements of risk, a long lead in time and slow build out rates. The current system is not suited to either increasing housing supply or making homes more affordable. To achieve public interest outcomes a fundamental change in the way that land is brought forward for housing and development is therefore required.

Land for Rural Housing

The fundamental challenge in delivering more rural homes is that large housebuilders cannot deliver the returns they require outside of cities and high growth areas. This means that other developers – community groups, land owners, SMEs, councils and housing associations – are responsible for delivering projects that are often complex and challenging.

The research highlights ways that communities and other developers can be supported to deliver housing – these include long term funding support, support for and expansion of facilitating bodies with development expertise, and specific, sympathetic rural planning and development policies. Most relevant to the commission's work are proposals for Land Use Plans or Local Place Plans to develop place-based plans for communities based on identified needs and a proposal for a national land assembly agency to support rural housing development.

The Benefits of Early Community Engagement

The report found that early and in-depth community engagement produced significant benefits, delivering better places, creating community support and reducing risk for developers. It highlighted that planning reform provides an opportunity to move to a front-loaded system where early engagement underpins the Local Development Plan.

The research found that if the full benefits of this approach are to be realised, early engagement should be linked to technical and feasibility studies to establish site viability. The Key Agencies should also play a statutory role in looking at site viability and land allocation.

Case Studies – Delivering More Homes and Better Places

The report examined five projects from around Scotland where land allocation and land assembly played a significant role in housing delivery and quality of place.

While it studies a variety of developments of different scales and geographies and with a mix of project leaders, it found that the most successful of the places were characterised by public sector leadership in assembling land and shaping the developments, by in-depth community engagement and by a patient capital

approach where the lead organisation sought to create longer term value through better placemaking.

The research makes a clear case for public authorities to play a leading role in land assembly and placemaking. It also highlights the benefits of brownfield development delivering homes close to places of employment and public transport.

Housing, Land & Placemaking – Lessons from Europe

This research examines three NW European countries with a strong track record in delivering housing and quality places, seeking transferable lessons that Scotland can apply. Again, it is notable that local authorities play an active role in assembling land and shaping development – although the authors stress that while councils play a leading role they work closely with developers and landowners to deliver commercially viable schemes.

The report concludes that if local authorities play an active role in assembling land and shaping development then this reduces developer risk. This could mean that in return for reduced risk developers would be willing to deliver more homes for a lower profit and that more of the land value could be used to deliver placemaking and green infrastructure.

The research concludes by recommending approaches to land assembly that Scotland should explore – these include:

local authorities pursuing an active land policy (buying sites in advance of need in order to shape placemaking and land values); pre-emption rights for public bodies (where councils have the first option to purchase a site); land re-adjustment (where a public body can temporarily take ownership of land for development, install infrastructure then return the land to the owners having deducted the cost of infrastructure).

Key Findings and Final Report

It is proposed that the key findings from the various pieces of work will be brought together in a report to be published early next year. The report will also draw upon findings from the Vacant and Derelict Land Recommendations, which are closely linked.

The basis of the report is proposed to be that

- business as usual is not an option since our research demonstrates that the current market led development system is not suited to delivering public interest outcomes;
- early and in-depth community engagement should form the basis of Local Development Plans and land allocation;
- local authorities should play a more active role in land assembly and shaping development and markets (this could take the form of local authorities and other public bodies collaborating to assemble land for development or making sites ready for development);
- in urban areas there needs to be a shift from greenfield developments on the edge of settlements to the re-use of brownfield land to meet climate change obligations and promote active health;

- in areas (rural and regeneration) where private developers do not operate there needs to be systematic support for alternative models of development including community led housing and development by SMEs; and
- changes should be made to the powers of public bodies to assemble land, particularly in urban regeneration areas.

Commissioners are asked to:

- consider the main findings from the review to date; and
- discuss and agree the proposed direction of travel for the final report and recommendations.



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Commissioners Meeting 1st December 2020

Paper 5
Tenant Farming Commissioner Update

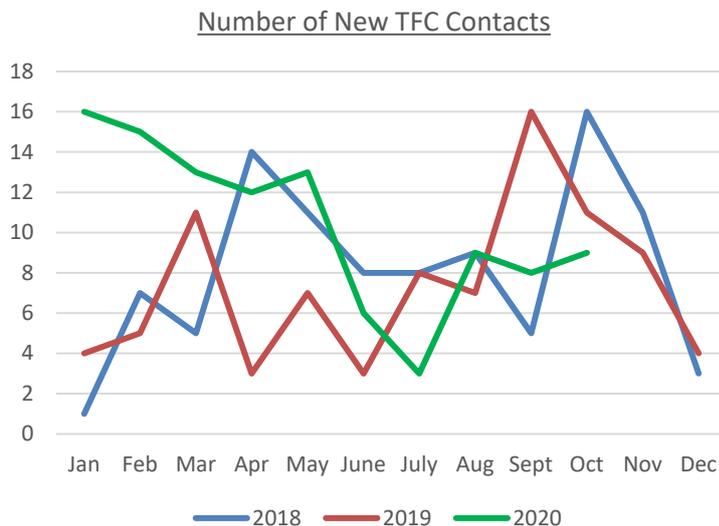
This paper provides an overview of TFC activities in 2020 and looks ahead to our work in 2021-23

1. TFC Codes of Practice and Guidance

Seven codes and 12 guides have been published to date. The latest code on conducting rent reviews was published in November. We are preparing a guide to statutory compliance on agricultural holdings which we aim to publish in January 2021. Following that, guidance will be required when the relinquishment and assignation legislation is enacted. Copies of the TFC Guide to Diversification were sent out with the STFA newsletter in February 2020 and copies of the Code on Conducting Rent Reviews were issued with their newsletter in November.

2. Casework

Over the past 2 years we averaged 9 new contacts per month from tenant farmers, landlords or professionals acting on their behalf.



The TFC has received a total of 104 new contacts from January to October 2020 compared with 88 and 98 respectively for full calendar years 2018 in 2019.

There was a higher level of enquiries at the beginning of 2020 due to a Cab Sec/TFC mailshot to all tenant farmers in Scotland (nearly 6,000) on the amnesty over the new year.

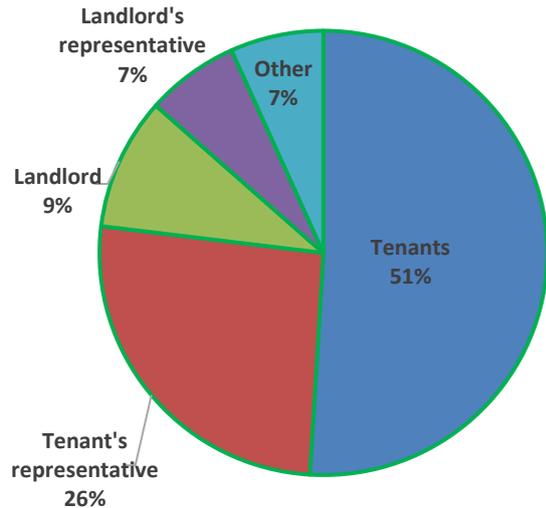
We are seeing an increase in repeat contacts regarding holdings that we have already engaged with – sometimes in cases where the relationship

between the parties are poor, but also often for reassurance that issues are being addressed fairly. Where an enquiry relates to a new issue on the same holding, these are recorded as “new contacts”.

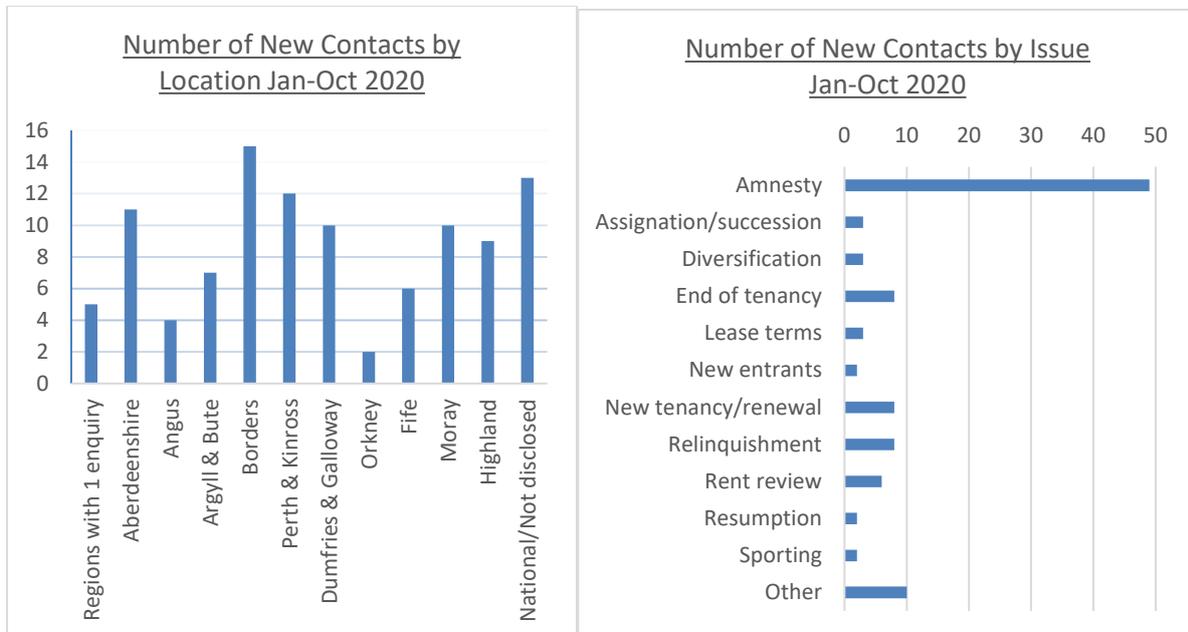
Initial Enquirer 2020

Initial enquiries in 2020 remain predominantly from tenants and their representatives (77%) – this is a few percentage points higher than 2019.

This is likely to be related to the significant increase in the number of enquiries about the amnesty on tenants’ improvements (49 in total), which also reflects the considerable effort TFAF members, SG and the TFC have put in to promoting the amnesty.



Advice on assignment, succession, relinquishment, end of tenancies and new tenancies was also regularly sought. As in previous years enquiries have been received from throughout Scotland.



In 2019, three formal alleged breaches of codes of practice were submitted to the TFC. One relating to the Code on Late Payment of Rent, another on the Code on the Maintenance of the Condition of Tenanted Agricultural Holdings, and the third not directly relating to a Code. We could not proceed with the alleged breach that didn’t relate specifically to a code of practice. In the other 2 alleged breaches, the evidence provided related to a period of time before either of the codes had been published, so we were unable to proceed under the procedures for an alleged breach as set out in the Land Reform Act (2016). We are managing one of these cases as we would a normal TFC enquiry, and we have a watching brief on the other to ensure that the relevant code of practice is followed. No formal applications reporting an alleged breach of a code have been received in 2020.

Looking ahead to 2021 and beyond we expect at least a similar level of casework, with a shift in emphasis away from the amnesty to relinquishment and assignment, repairs and maintenance obligations and rent reviews.

The implementation of housing standards across all housing stock by 2027 is likely to result in an increase in casework for the TFC as there will be differences in opinion over where responsibilities lie for repairs, maintenance and replacement. This may result in more alleged breaches of the TFC code on the maintenance and condition of agricultural holdings, and in a wider context may lead to the sale of sub-standard housing.

3. Review of the functions of the TFC

A review of the functions of the TFC concluded that all of the current functions of the Commissioner should be retained and a number of extensions were recommended. These included the TFC being granted the authority to sanction and impose financial penalties on anyone found to have been in breach of a code of practice; adding the provision and promotion of guidance, information and advisory documents as a TFC function; considering extending the TFC remit to include alternative business arrangements, such as joint ventures; and adopting the additional function of providing mediation services. These recommendations have yet to be taken forward by SG.

The full report was published on 1 April 2020 and can be found [here](#).

4. Tenant Farming Advisory Forum

TFAF continues to meet biennially to bring together stakeholders (SLE, STFA, NFUS, RICS, SAAVA, SG) to discuss issues of importance to the sector. The meetings include regular updates on TFC codes, guidance and casework issues, and legislation yet to be enacted under the 2016 Act. The past 3 meetings have included discussions on the implications of Brexit to the tenant farming sector, increasing the availability of farmland, land and buildings transaction tax, the professional conduct of agents, and rent reviews. The next meeting is planned for January 2021.

5. Scottish Land Matching Service

The Land Commission continues to support the Scottish Land Matching Service (SMLS). In its first year of operation it received 152 enquiries, with four times as many people looking for opportunities compared to those in a position to offer farmland. Enquiries have included all scales and types of enterprise, from market garden up to extensive sheep, cattle and arable operations. Four successful matches have been made, including a joint venture and a partnership agreement, providing a platform for more successful matches in the future.

The website www.slms.scot which launched in April has been a great success allowing people to register with the service simply and easily; and the most popular TFC blog to date has been the one on the 'Scottish Land Matching Service – Up and running'.

The aim for this coming year is to provide telephone support to 100 potential service users, carry out "taking stock" discussions with 40 service users, and enable the set-up of a further 8 agreements. Options for long term funding beyond the pilot phase are currently being investigated and a feasibility report is expected by September 2021 for a 5-year strategy.

6. Mediation

Pilot Mediation Service

The TFC pilot mediation service ran for 2 years until July 2020. Feedback from participants suggests that outcomes in all cases exceeded expectations and included outcomes that couldn't have been achieved in a court process. The mediation process was quicker and less costly than seeking resolution through litigation, and landlord and tenant relationships have

improved as the decisions made were their own, and not imposed by a third party. We also found that oversight by the TFC gave participants the confidence to take part, and that referral by the TFC created an expectation that participants should behave constructively.

A review of the pilot scheme concluded that there were 3 components of the scheme which worked collectively to engender confidence in the mediation process and which led to successful outcomes:

- TFC oversight
- Access to experienced mediators
- Financial support towards the mediation process

Our aim in the next 2 years is to take forward the lessons we have learnt from the pilot to continue progression towards mainstreaming mediation in the tenant farming sector. We believe that the support of the TFC is still valuable in providing reassurance about the mediation process to potential participants and in providing the oversight that engenders participants to engage productively. Having shown that mediation can be a valuable tool in dispute resolution, we would like to continue to provide support and leadership that improves access to mediation for more landlords and tenants. We therefore propose opening in new scheme for 2021-23 which provides:

- A TFC gateway to the scheme - to ensure parties are suitable and ready for mediation and to provide TFC support and reassurance if required;
- A SLC approved panel of mediators – to provide easy access to experienced mediators
- A contribution from SLC of one third of the total cost of the mediation process (payable to mediators on the panel) up to a maximum of £1000 - to provide an incentive for participants to try mediation.

We have issued an open invitation to mediators who would like to work with us, inviting them to apply to join our panel of mediators. The full details can be found on our website with the deadline for applications being 30th November 2020.

We are also considering how mediation might be piloted in other land disputes, particularly those involving many parties.

Mock Mediation Event

Along with the Agricultural Law Association we were planning to host a mock mediation event earlier in the year to illustrate how mediation works and to showcase its benefits in the tenant farming sector. The original plan was to stage a live role-play, representing a real mediation to resolve a waygoing on an agricultural holding. We are unable to now host the event physically, but since mediations have been moving online with great success, we decided that there is merit in showing how a mediation works online. This may prove to be the best approach as many mediators are expecting that video-conference mediations will become the setting for a good proportion of mediation activity in the future.

We have therefore recently recorded the online mock mediation, which is hosted by professional mediators, and has well-known representatives from the tenant farming sector acting as the tenant and landlord along with their professional advisers. The mock mediation will be shown in segments at a live online event on the mornings of the 7th and 8th December where delegates will be able to ask questions as the process unfolds. Sir Crispin Agnew (retired QC) will provide the concluding remarks.

Further information on this and all our work in mediation can be found at a new link on our website: <https://www.landcommission.gov.scot/our-work/tenant-farming/mediation>

7. Climate Change Opportunities on Tenanted Holdings

The Cabinet Secretary is keen to ensure that tenants have the opportunity to benefit from initiatives aimed at addressing climate change targets. He has tasked Crown Estate Scotland with the support of Scottish Forestry and the TFC to develop ways of achieving this. This includes:

- Analysis of current legislation and recommendations to Ministers. The 2003 Agricultural Holdings (Scotland) Act allows for tree planting under diversification regulations. There are however significant issues around waygo, plus the requirement to return the land to agricultural use which make planting significant areas under the legislation very difficult.
- Guidance on planting trees within and outwith diversification regulations.
- Developing case studies illustrating different scales of planting schemes including hypothetical financial modelling (cradle to grave)– including cash flow, capital inputs and valuations. Highlighting where additional financial support might be targeted to create incentives for planting on agricultural holdings.

8. Comms and Engagement

We continue to increase the number of TFC articles published year on year. This year the increase is due in large part to the ongoing coverage of the amnesty, including advice around agreeing improvements during Covid-19 restrictions.

Feedback from the TFC's regular monthly column in the Press & Journal has been positive, with the newspaper extending the word count. Anecdotal feedback suggests that this column and Scottish Farmer articles are the main source of information on the TFC for those with no or limited internet access. The TFC blog is published online every month and social media outlets are also used to promote TFC activities and publications.

The TFC continues to be asked to comment on events and policy in the sector and is invited to speak at key industry events - the most recent being the joint ALA and WS Society conference in November.

9. Looking ahead: 2021-23

Our casework load and focus is somewhat determined by the enactment of legislation in the 2016 Act and other policy changes in the sector; and whilst the TFC provides a leadership role for the sector, TFC input to policy and legislative development will be largely determined by the interests and priorities of the incoming Cabinet Secretary for Rural Economy and Tourism.

Rent Reviews

The statutory basis for determining rents of agricultural holdings in Scotland has been matter of discussion for many years. Following extensive review and stakeholder discussion, legislation for a new rent review process as specified in the 2016 Act has been put on hold for the time being. SG is to issue a survey at the beginning of 2021 to ascertain the extent of rent review problems.

Following a report from the TFC which compared the key attributes of the current and proposed statutory systems operating throughout the UK, and which assessed the pros and cons of the current and proposed systems in Scotland, SG is investigating the legal technicalities of the legislation. It is possible that the incoming Cabinet Secretary will seek legislative time in next parliament to make further amendments; if this is the case TFC input will be required. In the meantime, a new TFC code has been recently published to help address immediate issues.

Relinquishment and Assignment

The Land Reform (Scotland) Act 2016 introduces a new process that allows 1991 Act tenants to offer to relinquish their tenancy to the landlord in exchange for statutory compensation. It is a requirement of the 2016 Act that an independent valuer, who is able to calculate the amount payable by the landlord to the tenant for the relinquishment of the tenancy under Act, is appointed by the TFC.

We hope the laying of SSIs in Parliament to enact the legislation will be progressed early in the new year. We have plans in place to establish a TFC panel of valuers and will issue TFC Guidance on the process in due course.

Compensation for Resumption

At the request of the Cabinet Secretary the TFC, after consulting stakeholders, provided advice on compensation for tenants served with an incontestable notice to quit. Depending on the incoming priorities of the Cabinet Secretary this may require further input from the TFC.

Other 2016 legislation yet to be enacted

- Repairing tenancies – SG is seeking legal advice on whether this can be enacted if new rent reviews provisions are not.
- Sale when landlord in breach and abolition of the pre-emptive right to buy register - no further progress at present and no timeframe to bring them in.

Connections with other work

Given the breadth of TFC work there are obvious connections with other SLC workstreams including land valuation, tax, legislative proposals relating to LRRS, and alternative models for use and governance of land.

Commissioners are invited to comment on TFC activities.

Sarah Allen
Scottish Land Commission
23 November 2020