**Call for Evidence Questions**

The purpose of this Call for Evidence is to obtain your views on estate charges on housing developments. Please answer the questions in the section(s) which best reflect your own position. If questions in more than one section apply to you, please answer whichever questions you wish to. Please feel free to supply any further relevant information or evidence which is not covered by the specific questions or which you feel may be of assistance to us in considering these issues. You do not have to answer all questions.

**Please complete the following details in all cases:**

|  |  |
| --- | --- |
| Your name |  |
| Organisation (if applicable) |  |
| Email / telephone number |  |

|  |  |
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| Responses to this call for evidence may be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please place a tick in the box: |  |
| The Welsh Government may undertake further work to understand the issues raised in this Call for Evidence. If you would be willing to be contacted at a later date to contribute to this work, please place a tick in the box: |  |

We are interested in learning what impact the issues explored in this Call for Evidence have on the Welsh language. Please complete the following questions before turning to main body of the Call for Evidence:

|  |  |
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| We would like to know your views on any effects that estate charges have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. |  |
| Please also explain how you believe the use of estate charges could be changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language. |  |

Section 1: Questions for homeowners and residents

This section is aimed at those who are responsible for paying estate charges on housing developments. These are likely to be freeholders, but we are also interested in hearing from leaseholders who pay estate charges in addition to or through their service charge. Residents renting their properties on housing developments which are not adopted may also pay for estate charges through their service charges.

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|  | Question | Answer |
| 1 | Are you: | Freeholder  Leaseholder ☐ Tenant  If you are a freeholder or leaseholder please answer questions 2-33 and 49-50. If you are a tenant, please answer questions 34-50. |
| 2 | Date of purchase | Month:  Year: |
| 3 | Approximate date of construction | Year: |
| 4 | Did you buy direct from the developer? | Yes  No |
| 5 | Who was the developer responsible for the site? (If known) |  |
| 6 | Did you buy using Help to Buy? | Yes  No |

Estate charges

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| 7 | Do you pay an estate charge? | Yes  No  If yes, please answer the following questions |
| 8 | Who manages your estate (ie who do you pay your estate charge to)? |  |
| 9 | Has there been any change in the organisations which manage your estate during the period you have been resident?  For example a change in either the company responsible for the estate, or in the agent who fulfils the management functions on their behalf. If yes, give details of what happened. | Yes  No  Don’t know |
| 10 | What is the current charge? |  |
| 11 | How often is the charge payable? |  |
| 12 | Has the charge changed over time?  If yes, please give details of the changes (e.g. what the annual charges have been each year, details of increases/decreases etc) | Yes  No  Don’t know |
| 13 | Are there provisions which determine the increases to the charge each year (or other period)?  If yes, please describe these (eg if the charge increases by a set % per year, or in line with an index such as RPI) | Yes  No  Don’t know |

Service

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| --- | --- | --- |
| 14 | Are you issued with a breakdown of how the charge has been calculated? | Yes  No  Don’t know |
| 15 | Please list the services/facilities that your estate charge pays for  (These might include: roads, lighting, open space, play equipment, landscaping, car parking, insurance, or other items) |  |
| 16 | If you are a **leaseholder**, the same management company or agent may manage the communal leasehold amenities as well as the services or facilities covered by the estate charge. Alternatively these different services may be provided by different companies.  In your case does one company deliver all the services you are charged for?  If no, please explain who provides what services. | Yes  No  Don’t know |
| 17 | Do you know who owns the land which the estate charges are made in relation to?  Is yes, please state who. | Yes  No |
| 18 | Does the development where your property is located have a resident management company?  If yes, are you involved in it, and what are your views on its performance? | Yes  No |
| 19 | Are you consulted or otherwise involved in decisions about activity delivered by the estate charge?  If yes, please describe how, and your view on whether this is effective? | Yes  No |
| 20 | In your opinion, has the level of service changed during the period that you have been paying the charge?  If yes, please describe in what way |  |
| 21 | To what extent are you satisfied with the current arrangements for the management?  Please explain your answer | Very satisfied  Quite satisfied  Neither satisfied nor unsatisfied  Quite unsatisfied  Very unsatisfied  Don’t know |

Buying and selling

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| 22 | If you are a **freeholder**, how is your estate charge secured? | Estate rentcharge  Deed of covenant  Don’t know |
| 23 | At what stage in the purchase did you become aware of the estate charge? |  |
| 24 | If you bought your property from a developer (ie as a new build), was the existence of the estate charge made clear in:  Property advert  Marketing brochure/materials  Discussion with sales representatives  At any stage prior to your commitment to purchase (offer stage)  At any stage prior to your legal commitment to purchase (exchange of contracts) by your conveyancer  At any other stage (please state) | Yes  No  Don’t know  Yes  No  Don’t know  Yes  No  Don’t know  Yes  No  Don’t know  Yes  No  Don’t know  \_\_\_\_\_\_\_\_\_\_\_\_\_ |
| 25 | If you bought your property from an estate agent (ie as a resale), was the existence of the estate charge made clear in:  Property advert  Marketing brochure/materials  Discussion with sales agent  At any stage prior to your commitment to purchase (offer stage)  At any stage prior to your legal commitment to purchase (exchange of contracts) by your conveyancer  At any other stage (please state) | Yes  No  Don’t know  Yes  No  Don’t know  Yes  No  Don’t know  Yes  No  Don’t know  Yes  No  Don’t know  \_\_\_\_\_\_\_\_\_\_\_\_\_ |
| 26 | How satisfied were you with the level of information you received before the purchase about the charge?  Please explain your answer | Very satisfied  Quite satisfied  Neither satisfied nor unsatisfied  Quite unsatisfied  Very unsatisfied  Don’t know |
| 27 | How satisfied were you with the level of information you received during the purchase about the charge?  Please explain your answer | Very satisfied  Quite satisfied  Neither satisfied nor unsatisfied  Quite unsatisfied  Very unsatisfied  Don’t know |
| 28 | Has the charge affected buying, selling or getting a mortgage?  If yes, please explain in what way? | Yes  No |
| 29 | Would the existence of an estate charge affect your future decision-making when purchasing a property?  If yes, please explain in what way? | Yes  No |
| 30 | Have you ever been requested to pay an administration charge in relation to your estate charge?  If yes, please state what the charge was and how much you were requested to pay. | Yes  No |

Challenging the charge

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| 31 | Do you know if your management company and/or agent has a complaints procedure?  If yes have you ever used it and what happened? | Yes  No |
| 32 | Have you ever challenged the charge?  If yes, please describe what happened.  If you had to pay any legal or other costs, please explain how much and what they were for. | Yes  No |
| 33 | Have you ever had action threatened or taken for non-payment?  If yes, please describe what happened? | Yes  No |

Tenants

If you are a tenant, please answer these questions

If you are a freeholder or leaseholder, please turn to question 49.

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| 34 | Who is your landlord? |  |
| 35 | Do you pay an estate charge? |  |
| 36 | Who manages your estate (ie who do you pay your estate charge to)? |  |
| 37 | What is the current charge? |  |
| 38 | How often is the charge payable? |  |
| 39 | Has the charge changed over time?  If yes, please give details of the changes (e.g. what the annual charges have been each year, details of increases/decreases etc) | Yes  No  Don’t know |
| 40 | Are there provisions which determine the increases to the charge each year (or other period)?  If yes, please describe these (eg if the charge increases by a set % per year, or in line with an index such as RPI) | Yes  No  Don’t know |
| 41 | Were you given information about the charge before you took up the property?  Were the terms explained clearly to you?  Were you given help to budget or work out the affordability of the charges? | Yes ☐ No ☐ Don’t know ☐  Yes ☐ No ☐ Don’t know ☐  Yes ☐ No ☐ Don’t know ☐ |
| 42 | Are you issued with a breakdown of how the charge has been incurred? |  |
| 43 | Please list the services/facilities that your estate charge pays for  (These might include: roads, lighting, open space, play equipment, landscaping, car parking, insurance, or other items) |  |
| 44 | Do you know who owns the land which the estate charges are made in relation to?  Is yes, please state who. | Yes  No |
| 45 | Does the development where your property is located have a resident management company?  If yes, are you involved in it, and what are your views on its performance? | Yes  No |
| 46 | Are you consulted or otherwise involved in decisions about activity delivered by the estate charge?  If yes, please describe how, and your view on whether this is effective? | Yes  No |
| 47 | In your opinion, has the level of service changed during the period that you have been paying the charge?  If yes, please describe in what way |  |
| 48 | To what extent are you satisfied with the current arrangements for the management?  Please explain your answer | Very satisfied  Quite satisfied  Neither satisfied nor unsatisfied  Quite unsatisfied  Very unsatisfied  Don’t know |

General

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| 49 | Could anything be changed in relation to estate charges or adoption of spaces and facilities on housing developments to improve the situation for you as a resident? |  |
| 50 | Do you have any other observations about estate charges or adoption of spaces and facilities on housing developments that you would like to tell us about? |  |

Section 2: Questions for developers

We are interested in the extent to which adoption is pursued by developers, and the methods which are used to secure maintenance of common spaces and facilities where adoption does not take place.

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| --- | --- | --- |
|  | Question | Answer |
| 1 | Please explain your general approach to deciding what maintenance arrangements to use on your developments.  You may wish to reflect on the following questions:  Do you have a set policy on maintenance arrangements?  Do you always pursue adoption or only ever consider using a management agent, or does your approach depend on other factors?  Has your approach changed over time, and if so, how |  |
| 2 | Where charges are created, what are the facilities which they provide for?  If the types of charges differ according to the size of the development, or other factors, please indicate this and explain why. |  |
| 3 | Where private maintenance arrangements are used which require payments from residents, how do you secure the charge to freehold properties? (select all which apply)  Please explain why you use that format? | Estate rentcharge  Deed of covenant  Both  Deed of covenant supported by a nominal rentcharge  Both a fixed rentcharge and a variable rentcharge  Other  please state: |
| 4 | What happens to the ownership of the land once the development has been completed?  (I.e. is it retained by your company, passed to the estate charge management agent or company, or other party? Is the land ownership always treated the same way on each development?) |  |

Adoption

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| 5 | Do you ever seek adoption of spaces and facilities (such as open areas, play parks, roads, street lighting, and landscaping)? | Yes  No |
| 6 | Please give an indication of the proportion of your developments in Wales which are adopted, once complete?  (indicating the proportion of developments which are adopted completely, or where only the roads or other facilities are adopted) |  |
| 7 | What, if any, barriers to adoption do you encounter? |  |

Estate management

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| 8 | If you use them, how do you decide what management agent or company to use? |  |
| 9 | Do you require any particular qualifications or standards in the management agencies or companies that you use?  (eg membership of a professional body)  If yes, please describe what? | Yes  No |
| 10 | Please list the estate management agents that you have used on the developments you have built in the last 10 years |  |
| 11 | If there is a mix of leasehold and freehold properties on your developments, are they managed by the same company? | Yes  No |
| 12 | Do you ever use alternatives to commercial property management agents?  If yes, please describe what alternative approach you use, and why? | Yes  No |
| 13 | Where there are administration fees on a sale, remortgage or let of a property (such as fees for providing information, deed of covenant or notice of transfer and charge) do you set those fees?  Do you receive a proportion of the fees or are they paid exclusively to the management agent/company? |  |
| 14 | There are instances where residents complain about increasing service charges, or about the value for money of the services provided for by the charge. There are also mortgage companies which will not lend on properties where non-payment of estate charges may allow for the use of remedies which threaten the value of the property.  Have you been made aware of residents who have had issues with their estate charges for these or any other reasons?  If yes, please describe what these issues are, and what, if any, changes you have made to your practice to avoid these occurring in future. | Yes  No |

General

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| --- | --- | --- |
| 15 | Could anything be changed in relation to estate charges or adoption of spaces and facilities on housing developments to improve the situation for you as a developer? |  |
| 16 | Do you have any other observations about estate charges or adoption of spaces and facilities on housing developments that you would like to tell us about? |  |

Section 3: Questions for managing agents and management companies

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|  | Question | Answer |
| 1 | How many developments do you manage in Wales? |  |
| 2 | Please outline the number of properties in each development you manage in Wales  (eg x number of developments of 1-25 properties, x of 26-50 etc) |  |
| 3 | Do you operate in the rest of the UK?  If yes, please list where | Yes  No |
| 4 | Please list the activities which are covered by the charges.  If there are particular kinds of charges which relate to only some developments please explain what these are and why they apply in only some cases. |  |
| 5 | Do you provide a breakdown to residents detailing how the estate charge has been calculated? |  |
| 6 | Do you have a formal complaints procedure? | Yes  No |
| 7 | How many complaints have you received in the last 2 years?  If you are able to, please give an indication of the subject of the complaints, and how they were resolved. |  |
| 8 | What action do you take or are you entitled to take if the estate charges are late or unpaid?? |  |
| 9 | Who owns the land maintained via the estate charges?  (I.e. is it retained by the developer, passed to the estate charge managing agent, or other party? Is the land ownership always the same on each development?) |  |
| 10 | Could residents choose to change management agent if they wanted? Via what route? |  |
| 11 | Do you carry out any consultation with residents about the services that the charges provide for?  (either what activities are carried out, the number of times maintenance is carried out, or what contractors are used to provide the services)  If yes, please explain what this consultation entails. | Yes  No |
| 12 | Under the terms of the estate charges, how are changes calculated, and how frequently can they be made? |  |
| 13 | What forecasting of potential costs is undertaken? Do you use a reserve or sinking fund?  If you have is different arrangements for different sites, please explain why? |  |
| 14 | Does your organisation, or do you as an individual, belong to any professional bodies? |  |
| 15 | Please list your administration fees in connection with an estate charge  (eg for collection of arrears, provision of information for sale, consent to alter or let, deed of covenant, notice of transfer etc) |  |
| 16 | Do you keep all of the fee or do you share it with someone else, for example the rentcharge owner? |  |
| 17 | Could anything be changed in relation to estate charges or adoption of spaces and facilities on housing developments to improve the situation for you as a manager? |  |
| 18 | Do you have any other observations about estate charges or adoption of spaces and facilities on housing developments that you would like to tell us about? |  |

Section 4: Questions for Local Authorities

The questions in this section are principally aimed at understanding views around the adoption of areas which are not dealt with my statutory arrangements, such as that governing the adoption of highways or sustainable drainage systems (SuDS). However, if the adoption of all types of space and facility are related, please do refer to those processes where relevant to your answers.

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|  | Question | Answer |
| 1 | What is the policy of your authority on adoption of spaces and facilities other than roads?  (ie do you have a specific policy about the adoption of spaces and facilities such as open areas, play parks, landscaping etc, and why?) |  |
| 2 | Describe the factors which play a part in decisions about adoption. |  |
| 3 | Which departments within the authority are involved in decisions about adopting open space? Does any one department have the lead or final say? |  |
| 4 | What, if any, are the barriers to adoption? |  |
| 5 | If you ask for commuted sums for the adoption of facilities other than roads and SuDS, how are they calculated? |  |
| 6 | Do you have a service level agreement on timescales and average response times for dealing with adoptions? |  |
| 7 | Do you maintain records of which areas and facilities are adopted or not once a development has been completed? |  |
| 8 | What issues, if any, have you encountered in ongoing maintenance of unadopted areas on developments? |  |
| 9 | Do you ever adopt developments some years after their completion, where the developer did not seek, or achieve, adoption at an earlier stage?  If yes, under what circumstances? | Yes  No |
| 10 | Could anything be changed in relation to estate charges or adoption of spaces and facilities on housing developments to improve the situation for you as an authority? |  |
| 11 | Do you have any other observations about estate charges or adoption of spaces and facilities on housing developments that you would like to tell us about? |  |

Section 5: Questions for RSLs

We are interested in the experience of Registered Social Landlords in their capacity as developer, owner and/or manager of estates where open spaces and facilities are not adopted by the Local Authority, who may levy estate charges. We are also interested in learning about the experience of any RSLs which own properties for social rental on developments which are managed by other organisations, such as private management agents.

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|  | Question | Answer |
| 1 | Does your organisation:  (select all which apply) | Develop new housing  Manage estates (for which an estate charge is made to residents)  Pay estate charges to management agents in relation to properties on estates which were developed by another organisation |

RSLs as manager

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| 2 | How many developments do you manage where charges are made to leaseholders and/or freeholders for the management of open spaces and other facilities which are not adopted by the Local Authority?  Please give an indication, where possible of the number of properties on each development of this type  (eg x number of developments of 1-25 properties, x of 26-50 etc) |  |
| 3 | Do you only manage developments which are owned/developed by your own organisation?  If not, please explain who you also perform these services for and why.  In these cases, who owns the land which the charges relate to? | Yes  No |
| 4 | Please list the activities which are covered by the charges.  If there are particular kinds of charges which relate to only some developments please explain what these are and why they apply in only some cases. |  |
| 5 | Do you provide a breakdown to residents detailing how the estate charge has been calculated? |  |
| 6 | How many complaints have you received in the last 2 years (in relation to estate management charges)?  If you are able to, please give an indication of the subject of the complaints, and how they were resolved. |  |
| 7 | What action do you take or are you entitled to take if estate charges are late or unpaid? |  |
| 8 | Do you carry out consultation with residents about the services that the estate charges provide for?  If yes, please explain what this consultation entails. |  |
| 9 | Under the terms of the estate charge, how are charges calculated, and how frequently can they be made? |  |
| 10 | What forecasting of potential costs is undertaken? Is there a sinking fund? |  |

RSL as developer

These questions are intended for those organisations which develop property for market sale, either on a leasehold or freehold basis. Where properties are offered as a freehold, we are particularly interested in the arrangements made for those properties to contribute to the maintenance of any unadopted spaces and facilities through estate charges, however we are also interested in how the provision of those spaces is supported by charges made to leaseholders through their service charges.

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| 11 | Please explain your general approach to deciding what maintenance arrangements to use on your developments (where properties are offered for market sale)  Do you have a set policy on maintenance arrangements?  Do you always pursue adoption or only ever consider using a management agent (or providing management yourself, supported by resident contributions), or does your approach depend on other factors?  Has your approach changed over time, and if so, how |  |
| 12 | Where charges are created, what are the facilities which they provide for?  If the types of charges differ according to the size of the development or other factors please indicate this and explain why |  |
| 13 | Where private maintenance arrangements are used, how do you secure the charge to freehold properties?  (Select all which apply)  Please explain why you use that format? | Estate rentcharge  Deed of covenant  Both  Deed of covenant supported by a nominal rentcharge  Both a fixed rentcharge and a variable rentcharge  Other  please state: |
| 14 | Do you ever use alternatives to commercial property management agents and companies?  If yes, please describe what alternative approach you use, and why | Yes  No |
| 15 | Where there are administration fees on a sale, remortgage or let of a property (such as fees for providing information, deed of covenant or notice of transfer and charge) do you set those fees?  Do you receive a proportion of the fees or are they paid exclusively to the management agent/company? |  |
|  |  |  |
| 16 | Where areas are not adopted, do you conduct the maintenance activity yourself, or use a managing agent or company? Do you always follow the same approach? |  |
| 17 | If you use managing agents or companies, do you require any particular qualifications or standards?  If yes, please describe what. | Yes  No |
| 18 | If you use managing agents or companies, please list which you have used on the developments you have built in the last 10 years. |  |
| 19 | What happens to the ownership of the land subject to the estate charge, where one is created? Do you retain ownership or is it passed to a managing agent, if used? |  |
| 20 | Please give an indication of the proportion of your developments in Wales which are adopted, once complete?  (indicating the proportion of developments which are adopted completely, or where only the roads or other facilities are adopted) |  |
| 21 | There are instances where residents complain about increasing service charges, or about the value for money of the services provided for by the charge. There are also mortgage companies which will not lend on properties where estate charges allow for the use of remedies which threaten the value of the property.  Have you been made aware of residents who have had issues with their estate charges for these or any other reasons?  If yes, please describe what these are, and what, if any, changes you have made to your practice to avoid these occurring in future. |  |

RSL as estate charge payer

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| --- | --- | --- |
| 22 | Does your organisation own properties for rent on unadopted housing developments, which are subject to estate charges?  If so, please answer the following questions | Yes  No |
| 23 | Were any special provisions negotiated between the developer and your organisation about any estate charges payable on any of these developments?  If so, please explain what these are and their purpose | Yes  No |
| 24 | What developers were responsible for the sites where estate charges are payable? |  |
| 25 | What management agents or companies are estate charges payable to? |  |
| 26 | Do you have any comment on the level of the charges made?  For example, how the charges have changed over time, how they are calculated, how charges relate to the services provided etc |  |
| 27 | Please list the services/facilities that estate charges are made in relation to  (These might include: roads, lighting, open space, play equipment, landscaping, car parking, insurance, or other items) |  |
| 28 | Who owns the land which the charges relate to?  (If known. Options may include the managing agent, the developer, or another party) |  |
| 29 | Are you ever consulted or otherwise involved by the managing agent or company in decisions about activity delivered by the estate charges?  If yes, please describe how, and your view on whether this is effective. | Yes  No |
| 30 | Have you ever challenged an estate charge?  If yes, please describe what happened?  If you had to pay any costs, please explain how much and what they were for. | Yes  No |
| 31 | Have you ever had action threatened or taken for non-payment of an estate charge?  If yes, please describe what happened | Yes  No |

General

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| 32 | Could anything be changed in relation to estate charges or adoption of spaces and facilities on housing developments to improve the situation from your perspective? |  |
| 33 | Do you have any other observations about estate charges or adoption of spaces and facilities on housing developments that you would like to tell us about? |  |

Section 6: Questions for property lawyers

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| 1 | In your opinion, are purchasers usually aware of the existence of any estate charges before they commit to purchase?  Please explain whether there are differences between the awareness of estate charges in purchasers of new build homes and those buying via resale? | Yes  No |
| 2 | In your opinion, do buyers fully understand the ramifications of estate charges?  Please explain your answer | Yes  No |
| 3 | At what stage in the transaction are you usually alerted to the presence of estate charges on a property? |  |
| 4 | Have you seen a change in the proportion of sales which include estate charges?  If yes, please explain what that change has been, and in respect of what type of properties? Do you have any observations about why this has changed? | Yes  No |
| 5 | Are the estate charges which you see compliant with the UK Finance Lender handbook as drafted?  If no, please explain in what way, and are developers amenable to making the required changes? | Yes  No |
| 6 | Have you encountered sales which have fallen through because of the existence of an estate charge?  (Eg if the mortgage company refused to lend on the property, or if the purchaser was unhappy with the likely level of the charge)  If yes, please explain what the reasons have been, and give an indication of how common this is. |  |
| 7 | What are the average costs of a deed of variation on an existing rentcharge to exclude the remedies in Section 121 of the Land and Property Act 1925, or to amend the terms to those acceptable to the major highstreet lenders? |  |
| 8 | Are the fees charged for the administration of the estate charge reasonable in your opinion?  (For instance in relation to notice of transfer, notice of charge, consent to let or alter, deed of covenant, certificate of compliance)  Please explain your answer and give examples | Yes  No |
| 9 | Do you see charges being created in breach of the Rent Act 1977?  (For example, with review clauses which bear no relevance to the cost of maintenance, or where there are multiple estate charges on a property) |  |
| 10 | What is the impact on transaction times where there is an estate charge? |  |
| 11 | Could anything be changed in relation to estate charges or adoption of spaces and facilities on housing developments to improve the situation for your organisation? |  |
| 12 | Do you have any other observations about estate charges or adoption of spaces and facilities on housing developments that you would like to tell us about? |  |

Section 6: Questions for others

We are interested in hearing from other individuals and bodies who have an interest in the adoption of spaces on housing developments, or in the use of estate charges to provide for the maintenance of common spaces and facilities on those developments. Professionals such as solicitors, estate agents and mortgage providers may have an interest, and there may be other individuals and groups who also have an interest which is not covered by the previous sections of this document.

If you would like to contribute to this Call for Evidence, but do not fall into any of the groups identified in sections 1-6, please use this space to explain what your interest is, and what your views are.

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