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Dear Mr Brooks,

## SCOTLAND'S FUTURE LANDSCAPES?

I am writing on behalf of Scottish Environment LINK with comments on the above discussion paper. Scotland's celebrated landscapes are of fundamental importance to our national and local identity and economy and are one of the primary concerns of LINK, which has been engaged in key landscape matters since its inception. We thus very much welcome the opportunity to comment upon the issues raised in this paper. Our response follows the seminar on landscape organised by LINK on 19 January 2004 - a report of this has already been sent to you and further copies are available from the LINK office. This response expresses the collective views of the seminar but also key considerations subsequently raised within the LINK network.

### General Comments

The LINK member organisations listed at the foot of this letter agree with the integrative approach suggested within this paper, but emphasise that the European Landscape Convention must underpin all future policies and strategies in Scotland if landscape is not to remain very much undervalued as at present. An effective strategy for safeguarding and enhancing landscapes must be the outcome of not only this consultation but must also be reflected in the policy and strategies arising from the current reviews of agriculture, forestry and planning.

Three landscape sectors need particular attention: -

1. Stronger protection for those landscapes that might be recognised as being of global, European or National importance including National Parks, National Scenic Areas, and areas of wild land and cultural landscapes which are presently not designated.
2. More effective management of the changing practices in agriculture and forestry to recognise the switch in emphasis from production to consumption and the opportunities afforded by new national planning provisions for biodiversity and water.

3. Enhancement of 'green spaces' around and even within cities, towns and villages that afford opportunities for leisure and recreation and are vital to a sense of place and identity, historical continuity and community identity.

In addition, coastlines or seascapes need to be more closely recognised in line with the landscape principles set out in the paper.

## Responses to specific questions.

**Q1 Sections 1 and 2 set out a number of reasons for regarding all Scotland's landscapes as important to the life of the nation.**

**a) Do you agree with this proposition and the case put forward to support it?**

Yes, it is difficult to argue with this principle, yet the problem remains that "landscape" means different things to different people and LINK bodies acknowledge the wider community of interest.

**b) Are there any values associated with the landscape over and above those listed in Box 2 to which you would wish to draw attention?**

Yes, the negative administrative, political and economic values that affect the landscape often cause its depreciation and lack of attention. With agriculture, forestry and enterprise frameworks focused upon immediate post war values, an urgent review of institutional structures is required to realise the potential for the nation to benefit more from its landscape potential.

An urgent review of the growing and vital tourist and accommodation industry is also needed. It is inconsistent in the extent to which it engages with the landscape and its protection across the country, while it is hugely dependent upon its qualities. Agencies and tourist boards vary considerably in the attention they give to landscape quality.

In SNH's 2002 policy statement Wildness in Scotland's Countryside qualities of wildness were highlighted as in need of specific recognition as an important landscape value and in need of protection and enhancement. Given the ongoing lack of an energy production framework and strategy, little public progress appears to have been made in addressing public needs for places of solitude and tranquility. Put simply, landscapes have important financial and functional values, but given their importance to collective and individual well being, any drift to value landscapes on this footing alone must be avoided.

**Q2 SNH believes Scotland's landscapes deserve greater care. Do you agree and, if you do, how do you think that SNH and others can best achieve this?**

Yes - a number of steps are necessary.

Adoption of the European Landscape Convention by the UK Government and implementation within Scotland. The Scottish Executive can, while awaiting UK ratification, press ahead by adopting its principles as a guide to best practice when drawing up policies and strategies, particularly when preparing the framework for Strategic Environmental Assessment.

The Scottish Executive should draw up a strategy for determining locations for further National Parks. The paper does not in any way address future National Parks that are statutorily defined as outstanding landscapes and thus showcases for best landscape management.

The review of National Scenic Areas appears to have disappeared and is of considerable relevance to this debate and needs urgent action in response from the Scottish Executive with existing NSAs being strengthened and in some cases extended. Additional NSAs should be identified.

The planning system could be strengthened to give better protection for our more important landscapes, and SNH could support the call for such changes. For instance, the building of machine built tracks on upland estates should be brought fully within the planning system and the permitted development status for agricultural purposes should be removed. This current loophole is responsible for some of the worst damage caused to Scotland's mountain landscapes over the last 10 to 20 years.

Public agencies should all make provisions for more effective recognition of the importance of landscape and planning policy guidance for landscape requires further strengthening.

**Q3 Scotland's landscapes will continue to evolve. This section has described the factors that SNH has identified as the principal forces for change over the past 50 years.**

**a) Do you agree with this analysis?**

Landscapes do evolve. Some forces are difficult to control but the main driving forces for change are political and economic policy and they will repeatedly cause haphazard changes to landscape (for example, the current rush to build windfarms because of energy policies or lack of them) unless a more sustainable framework is brought into place.



**b) Are there new forces, already with us or foreseeable, that will shape Scotland's landscapes over the next few decades?**

These are most likely to immediately arise as a consequence of the growing clamour for wind farms which if not properly planned can radically affect skylines. EU policy such as the CAP and WFD are also of vital importance. The collapse in the market for timber; climate change; the pressure for further housing and transport developments require urgent Scottish Executive intervention in relation to landscape impact.

**Q4 Change can be for the better or the worse, or indeed neutral in its landscape effects. This section has identified a number of trends that SNH views as detrimental to landscape quality.**

**a) Do you agree with this assessment?**

The SNH paper does make a good assessment of the detrimental trends and the eight bullet points cover the main areas of concern to LINK member bodies.

**b) Are there any other significant developments that we have omitted?**

The section on remote and wild countryside could include the notion of allowing the level of wildness to be increased. The restoration of bulldozed tracks is one example of finding practical ways of re-wilding parts of Scotland and allowing nature to gain control once again. We believe that areas should be identified where this kind of restoration work can be introduced to demonstrate that wild land that shows some signs of human interference can be made more wild again.

**Q5 This section has put forward six principles which SNH believes should steer our efforts to guide and manage change in Scotland's landscapes in the future.**

**a) Do you agree with these six propositions?**

By and large the LINK bodies listed here agree, subject to clarification of the definition of quality. It is difficult to disagree with this statement, but what does "quality" mean? SNH itself has lost some of its former design skill and focus, and may be falling short of adhering to Scottish Executive guidance. Similarly, planning authorities are suffering from a loss of specialist staff, for example archaeologists.

**b) Do they leave out anything important?**

A seventh principle could be added to the list - past mistakes should be re-addressed, e.g. through new requirements being attached to new grant funding for land managers.

**Q6 This section has highlighted a variety of challenges that in SNH's view must be tackled successfully if Scotland's future landscapes are to**

be at least as good as those we have today. For each of the sub-sections, addressing a specific landscape setting or theme:

**a) Do you agree with the concerns identified, and are there others that you would wish to register?**

As acknowledged, coastal and island landscapes have been largely omitted from the SNH paper and deserve as much attention as those listed. Seascapes provide an important element in Scotland's attractiveness and identity. Indeed, coastal scenery is a vital component in many recreational visits to the countryside, and whether viewed from land or water, this aspect of our landscape must be afforded better recognition and protection.

**b) How do you think that the challenges, listed as bullet points, can best be tackled?**

Government needs to demonstrate more commitment to landscape. Without it, it is very difficult to influence the decision-making processes about landscape as it is so fragmented - responsibility does not necessarily fall with one particular minister and may even be split between Westminster and Scotland. More explicit objectives for landscape improvements need to be set, for example, setting targets for miles of hill tracks to be removed.

**c) Overall, do we have available the tools and mechanisms necessary to ensure better care for Scotland's landscapes?**

SNH's Landscape Character and Historic Scotland's Landuse Assessment now need to be extended into evaluation and appraisal, and translated into strategic planning. SNH's "Natural Heritage Futures" document could be revisited for pointers to the way forward for landscape management. Area-specific landscape policies could guide local plans with a powerful planning instrument to make subsidy/incentive schemes fit in with landscape policies as employed within for example, German Regional Land-use Planning.

**Q7 SNH believes that only shared commitment and collective action will secure for Scotland's landscapes the attention and care that they deserve. How can such a shared agenda be generated, bearing in mind the need to marry local and wider perspectives?**

Potentially National Parks offer the clearest immediate opportunity, and if successful can demonstrate best practice in landscape protection while, if operating effectively, engaging national and local stakeholders alike. The steer from the Water Framework Directive has to be fully adopted. Planning also has a major role to play. However land ownership also remains a key determinant of failing landscapes - the ongoing process of land reform legislation needs to recognise and provide for this. The next step has to be whether all owners are looking after the landscape on their



estates in the same manner that householders are required to maintain the appearance of their dwellings and curtilage.

**Q8 This section has spelt out the wider range of individuals and organisations whose contributions are essential to the better care of Scotland's landscapes.**

**a) Do you agree with the roles identified for all the various interests?**

While partnership between all interests is essential, the role of the Scottish Executive is paramount. Given the number of public agencies who have some responsibilities in this arena, it is only the Executive which has the ability to take an integrated approach and to promote the positive change required. Continued efforts will be necessary to encourage the tourist industry, in particular VisitScotland, to embrace the crucial importance of the landscape to its business.

If the Executive cannot effect a more integrated approach to landscape among the most relevant agencies (SNH, Historic Scotland, Forestry Commission Scotland, Scottish Enterprise, Highlands and Islands Enterprise, VisitScotland, SportScotland, National Parks, SEERAD) it needs to review whether a strong new public agency should be introduced.

Much is asked of unpaid individuals and the voluntary sector to engage national and local government with the landscape. The clearest current example is the widespread controversy over wind farm development proposals. The voluntary sector, both locally and nationally, requires greater recognition and funding if it is to engage meaningfully in the landscape debate.

**b) How can you or your organisation contribute to achieving the better care desired?**

Member organisations of Scottish Environment LINK are highly committed to Scotland's land and sea scapes as a source of inspiration, widespread social and economic benefit, international attention and the future of our nation. Given the success of engaging LINK representatives in Executive working groups or forums that have led to pioneering legislation on land reform (Access Forum), water and nature conservation we urge that the Executive now urgently establish a similar review group for the future of Scotland's landscape with LINK representation on it.

We hope these comments are useful. Do not hesitate to contact us for further information. I look forward to hearing from you.

Yours sincerely

Bill Wright  
Convenor of LINK's Special Areas Task Force

The following LINK member organisations support this response;

Association of Regional and Island Archaeologists  
Badenoch and Strathspey Conservation Group  
British Association of Nature Conservationists Scotland  
Cairngorms Campaign  
Council for Scottish Archaeology  
Friends of Loch Lomond  
John Muir Trust  
Marine Conservation Society  
Mountaineering Council of Scotland  
Ramblers' Association Scotland  
ruralScotland  
Saltire Society  
Scottish Council for National Parks  
Scottish Countryside Activities Council  
Scottish Countryside Rangers Association  
Scottish Native Woods  
Scottish Raptors Study Groups  
Scottish Wild Land Group  
Scottish Wildlife Trust  
Sustrans  
The National Trust for Scotland  
Woodland Trust Scotland