

Scottish Environment LINK: Land Use Strategy for Scotland 2016 -2021

Summary

Scottish Environment LINK was hugely supportive of the production of a Scottish Land Use Strategy (LUS) by Scottish Government in 2011. Five years on, we continue to believe that with full political and financial support it can help secure sustainable land use in Scotland, delivering benefits for the environment, society and the economy. Since its publication, significant progress has been made in a number of areas and other UK countries are following Scotland's lead with this innovative approach. We believe it is important that the revised LUS maintains momentum and overcomes the remaining obstacles to delivery in order to translate recommendations into action. The LUS draft released for consultation shows that Scottish Government is starting to recognise that this is the case. However, we don't feel that the proposals are ambitious enough to deliver the policy and delivery mechanisms required to secure positive change in land use in Scotland.

Recommendations

- Land use and land ownership are inextricably linked and there is a real opportunity for the LUS to help secure meaningful land reform if the two processes are adequately coordinated. An amendment to the Land Reform Bill ensuring that a land rights and responsibilities statement takes account of the LUS is an essential interim step, as is an amendment explicitly stating that implementation and monitoring of the LUS falls within the functions of the Land Commissioners.
- The Land Use Strategy must be fully integrated and aligned with the National Planning Framework and National Marine Plan; and sit *above* all other policies concerning land, setting the agenda for policy revision, development and implementation.
- Guidance, and a framework for decision making on land use at a *national* level, must come from the LUS but this must be coupled with a *regional* and *local* approach to delivery across Scotland, which takes account of specific conflicts, pressures and solutions.
- Guidance, incentives and regulative tools must be fully aligned to secure buy-in from land managers and deliver multiple benefits, ensuring most efficient investment of public money.
- Targets and actions flowing from the LUS must be SMART, *outcome* focused and aligned with the targets in supporting strategies. Progress reviews must comprehensively report on progress towards targets, identify and find solutions to barriers to delivery.
- The revised LUS must provide a clear long term vision and clearly define the *short-term* and *long-term* steps required to achieve its Objectives. This must be used to guide future decision making on public and government policy influencing land use, providing continuity to 2050 and beyond.
- Scottish Government must carry out an assessment of the indicators, how representative they are and how they can be reported to adequately demonstrate progress towards the LUS Objectives.
- The LUS should be the mechanism for 'climate-proofing' land use decision-making, ensuring that all land use-related policies contribute to climate change mitigation and adaptation.
- Five year review cycles across all strategies regarding land use, for example Scottish Forestry Strategy and Scottish Land Use Strategy, must be aligned in order to streamline the review process.

This response is endorsed by the following Scottish Environment LINK member organisations: Association for the Protection of Rural Scotland; Buglife; Butterfly Conservation; Froglife; North East Mountain Trust; Nourish Scotland; Plantlife; Ramblers Scotland; RSPB Scotland; Scottish Badgers; Scottish Campaign for National Parks; Scottish Wild Land Group; Wildfowl and Wetlands Trust and Woodland Trust Scotland

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Response to consultation questions

Q 1a Do you think that the Vision, Principles for Sustainable Land Use and three long term Objectives are still fit for purpose?

Yes, broadly but see qualifications below.

Q 1b Please provide your reasons for your answer.

The Objectives currently give too much prominence to prosperity, as opposed to the wider objective of well-being, and (by implication at least) to short- as opposed to long-term interests. To correct this, the order of the first and second Objectives should be reversed and “prosperity” should be substituted for “long-term well-being” in the first. A Land Use Strategy above all should take a long-term view and recognise the full breadth of factors that contribute to a truly “good life”.

The landscapes in which Scotland’s people live and spend time – be they urban, rural or coastal – are crucial to the quality of their lives. They help to shape the country’s sense of itself and its image in external eyes. Many of them are of a very high quality and as such are a key component of Scotland’s natural capital, contributing to health and well being, providing a much valued recreational resource, supporting the tourist economy and with the potential to optimise biodiversity. Others are impoverished, despoiled or neglected and much in need of enhancement. All deserve attention and care, in line with the principles of the European Landscape Charter, to which the UK is a signatory. The LUS should drive forward this agenda, as set out in Scotland’s Landscape Charter, which the Scottish Government should sign, promote and implement.

Q 2a Do you agree that continued use of an ecosystems approach is an effective way to manage Scotland’s natural capital?

Yes, as part of a package of measures which protects all of Scotland’s natural heritage.

Q 2b Please provide reasons for your answer.

The habitats and species that are integral to the functioning of ecosystems must not be forgotten in favour of striving to maximise the utilitarian value of Scotland’s natural heritage. Protected areas are in place to conserve priority species and habitats and are able to act as refuges from which those species and habitats can expand into the wider countryside once management is appropriate. This delivers ecologically coherent networks and robust and resilient ecosystems. Delivering this can be challenging in practice; particularly on privately owned land. It will require concerted effort and support from Scottish Government to guide and facilitate land use change which contributes meaningfully to ecosystem functioning.

The land use pilots are cited in the consultation as having successfully demonstrated the ecosystem approach and what it means in practice. However, whilst they certainly had benefit in providing information, clarifying issues and illuminating choices, they did not get to grips with the challenge of deciding which particular combination of ecosystem services is

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most desirable in the region concerned and what pattern of land use might best deliver it. Indeed, they served to illustrate some of the tensions that would have to be resolved in order to do so. Despite this, valuable lessons were learned through the pilots in stakeholder engagement, trade-offs and limitations of data. If the potential of the approach is to be realised, and its credibility sustained, momentum must now be maintained into a delivery phase.

Q 3a Is the relationship as set out in the draft Land Use Strategy 2016 – 2021 clear?’

No. As demonstrated on Page 14 of the LUS consultation, the LUS currently sits alongside a number of policies, each of which influences land management in Scotland. Most of these policies have been drafted independently of the LUS and are not sufficiently aligned to deliver the LUS Objectives. The Scottish Economic Strategy 2015 is depicted as an overarching strategy, which should not be the case if Scottish Government is dedicated to sustainable development. We believe that the LUS must sit alongside the National Planning Framework and Marine Plan; inform and guide Scotland’s Economic Strategy; and sit *above* sectoral policies, providing a framework and setting the agenda for policy revision and development. This is the only way to ensure that LUS Principles are fully embedded in all policies which influence how land is used in Scotland. Furthermore, once policies are aligned with the LUS a standardised reporting system must be developed, so that their contribution towards delivery of the LUS Objectives can be measured. Simply referring to the LUS is not enough.

Q 3b Do you have any comments on the relationship between the LUS and Scotland’s Economic Strategy 2015, National Planning Framework, National Marine Plan and other relevant policies?

The way that we use Scotland’s urban, rural and marine areas is fundamentally linked but the way that we plan for these uses is not as well connected as it could be, with major policy documents in the form of the National Planning Framework, the National Marine Plan and the Land Use Strategy all taking a rather sectoral approach. As stated above, it is not enough to simply refer to the LUS within these documents. In fact, despite both being published in 2015 as the revised LUS was being developed, neither Scotland’s Economic Strategy nor the National Marine Plan even mention the LUS. This suggests that embedding the LUS Principles is not high on the agenda when developing new plans or strategies. A more detailed review of the policy environment would also be useful. This would need to identify potential conflicts and provide a policy- and decision-making framework within which land use delivery mechanisms are developed, coordinated and aligned, maximising delivery of LUS Objectives. Guidance on the application of LUS Principles in other strategies, plans and policies, regulations and incentives is also required. A key LUS document to address this issue, due 2012, has not been published owing to ‘diversion of funds for other priorities’, another worrying sign that delivery of the LUS Objectives has not been made a priority by Scottish Government.

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Q 4a Do you think that the activities described above could be useful?

Yes, both useful and necessary.

Q 4b Do you have any suggestions on other kinds of information and activities that could be useful?

The ecosystem approach is dependent upon habitats and species and spatial planning. A national ecological network is a key mechanism with which to implement a real ecosystem approach on the ground yet it is not mentioned at all in this consultation. We would query how the Scottish Government is planning to deliver an ecosystem approach without the structure of a spatially and ecologically coherent ecosystem network.

Scottish Government must clearly state that the LUS is a material consideration in planning decisions and that the NPF and Development plans will have regard to its Principles. Otherwise, the activities outlined may not result in a consistent approach.

Although it is too late to embed LUS Principles into the current version of the National Marine Plan, regional marine plans have yet to be developed. Scottish Government should take steps to ensure that these are aligned with the LUS Principles.

Q 5 How could the content of the current Scottish Forestry Strategy be updated to better reflect the Objectives and Principles of the Land Use Strategy and other key priorities?

Woodlands and forests must be managed sustainably, delivering multiple environmental, social and economic benefits. Key policy “themes” include:

- The protection, restoration and expansion of native woodlands;
- The protection and restoration of priority open ground habitats;
- The sustainable management of woodland, forests and scrub to benefit nature;
- The creation and maintenance of coherent ecological networks;
- Adopting an integrated approach to sustainable land management, which delivers multiple benefits to the people of Scotland (including access, health, carbon management and flood mitigation)
- Support for ongoing scientific research to enable the above outcomes to be delivered in a robust, evidence-based manner.

The Scottish Forestry Strategy is a key mechanism for the delivery of sustainable forestry in Scotland. The Strategy requires updating to reflect changes in approach, legislation and delivery mechanisms which have occurred in the last 10 years. Whilst the Strategy itself is significant, it is also important that it is part of the wider environmental policy arena in Scotland. The Land Use Strategy should function as the primary strategy under which specific land use sectoral strategies are nested. Each sectoral strategy should be guided by, and integrated into, the Land Use Strategy to ensure a coherent approach to land use across the country.

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Any revision to the SFS should ensure that the current sustainable approach to forestry is retained and that “a reasonable balance between the production and supply of timber and the interests of conservation” is delivered, as required under Section 1 (3A) of the Forestry Act 1967.

We would also welcome more active monitoring of biodiversity, particularly for priority species and habitats, which we feel has been declining in recent years. The forestry sector can play a key role in protecting and enhancing biodiversity and the landscape, particularly outwith designated sites. A stronger link to other sectors, through the LUS, will enhance this ability by improving dialogue between relevant stakeholders and reducing the likelihood of conflict between competing land use priorities.

We are keen to retain the multiple benefits approach of the current SFS and to ensure that any revised document avoids becoming a “national planting strategy”. Any woodland expansion targets should be realistic and achievable. By linking with the LUS, a revised SFS should ensure that existing open habitats such as peatlands, heathlands and priority agricultural land (such as breeding wader sites) are not viewed as “prime candidates” for woodland expansion. In addition, sites which have been inappropriately afforested in the past should be returned to a more natural state. The setting of unrealistic planting targets may hinder this process.

Scottish Environment LINK would welcome the opportunity to be involved in any review of the SFS at an early stage.

Q 6a Do you consider that there could be advantages in having a single policy statement about land which deals with ownership, use and management?

The way that land is used and managed fundamentally affects the environment. It is in turn influenced by a wide range of factors, from ownership and tenure to Government policies at both national and international levels. The legislation, regulation and incentives involved in the latter have not so far been adequately aligned to deliver the best outcomes. Therefore, there is merit in a single policy statement designed to harmonise all these elements. Ideally, this would have been prepared in advance of the Land Reform Bill and revised LUS to ensure that the development of both was coordinated and complementary. Retrofitting a single policy statement on top of these will not be as effective so Scottish Government must ensure that the two processes are synchronized in the interim. Land use and ownership rights are inextricably linked and there is a real opportunity for the LUS to help secure meaningful land reform if the two processes are adequately coordinated.

Q 6b Do you have any comments on the relationship between current land related policies and how these would relate to a single policy statement?

The current policies are too sectoral in character; the vital distinguishing role of a “land policy” would be to provide a framework for their better harmonisation in future, based on

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an explicit recognition of the fact that we all, in one way or another, have an interest in how Scotland's land is used and managed, and have a corresponding set of responsibilities. Put another way, the policy would spell out the "bargain" between those who own and manage land and the rest of society.

Q 7a Do you agree that models and GIS tools could help inform decision making about land use/management change?

Both modelling and GIS tools can be useful for informing decision making. However, it is important not to reinvent the wheel.

Q 7b Please provide your reasons for your answer.

A number of mapping tools already exist and both regional land use pilots developed additional mapping tools. They can be useful for visualising existing land uses and predicting outcomes of land use change. However, as the question implies, these tools can only ever aid decision making and securing land use change requires us as a society to make collective decisions regarding what change is appropriate where and how that change will be secured. There is a risk that too much emphasis and resources are placed on developing such tools instead of developing the mechanisms, incentive/regulatory or otherwise, which would secure landowner buy-in and meaningful land use change.

Mapping tools need to be underpinned by reliable data. Data collection, verification and storage must be supported centrally if government is able to draw on high quality data to build models to inform national land use. A key aspect to this is reliable biodiversity data, usually collected through citizen science projects, including the National Plant Monitoring Scheme. Scottish Biodiversity Information Forum also has an important role in ensuring the efficient, collection, management, interpretation and use of biological data. Reliable monitoring data on the biological impacts of SRDP investments is also required. Scotland is alone in having no national wide assessment of the biological impact of its agri-environment scheme and hence the value of spatial mapping of RDP options, even if it were available, will not be at a high enough quality to inform land use management. Similarly, it is essential to have authoritative and up-to-date information about landscape character and quality, and trends in these, and about recreational demands and resources.

Q 7c Do you think that a baseline ecosystems services mapping tool could be useful?

Development of a baseline mapping tool containing national data would be an essential step in ensuring that any national and regional land use planning is done in a systematic, consistent and coordinated way. It would also reduce the burden on local authorities if they have baseline data to start with. The pilot projects demonstrated that relatively little baseline data were required to stimulate a conversation with stakeholders, which can often provide more realistic information about what changes are feasible or desirable at a regional level.

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Q 7d Do you have any comments on a mapping tool?

The Borders regional land use pilot developed a useful tool which investigated the interactions between different land uses and delivery of multiple ecosystem services. The Aberdeenshire tool focused on forestry and as such would be of less use when investigating land use tradeoffs and ecosystem service delivery. Therefore, if Scottish Government were to choose one of these tools to roll out further as a baseline, we would support further development of the Borders tool.

The Scottish Biodiversity Information Forum is working with the National Biodiversity Network, on building a Living Atlas for Scotland which would complement the Scottish Environment Web initiative. The beta version of this tool has already shown the potential for the approach. Support from the government is now needed to take this valuable work forward so that land managers across Scotland can benefit from this powerful information tool.

Q 8a Do you agree that regional land use partnerships could be a helpful way to support regional delivery of the Land Use Strategy?

Yes, regional land use partnerships would play an important role in delivery of regional land use plans. However, it is not enough for Scottish Government to say that they will just encourage the development of landscape partnerships. They should outline in the LUS Action Plan all of the specific steps they will take to resource, facilitate and support the development of regional land use partnerships. Additionally there should be a model devised to enable a consideration of how these should be structured, operate, be composed, be accountable and their legal constitution and statutory status. There should be a discussion on how these would work alongside the National Parks.

Q 8b Who do you think could be best placed to lead these initiatives?

In the first instance, local authorities – and where they exist national park authorities - might be best placed to lead, if given adequate support from Scottish Government and, at their instigation, from other public bodies.

Q 8c Can you suggest any alternative means of supporting the delivery of the Land Use Strategy at regional level?

The development of the Borders land use pilot was supported by the Tweed Forum, which contributed significantly to the stakeholder engagement element of the pilot. Scottish Government could carry out a scoping exercise to identify similar bodies in other regions. National Park Authorities, those facilitating the delivery of Biosphere Reserve objectives and NGOs active in particular regions may be able to help. Supporting resources from Scottish Government could then be targeted more towards initiating conversations in regions without existing partnerships, perhaps using consultants to carry out initial engagement. For example, the Carse of Stirling Ecosystem Services Project, lead by SEPA and SNH, was

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developed in an area with no existing partnerships. A consultant was commissioned to engage local people, bringing together a stakeholder panel to deliver the project in partnership with local farmers and land managers, community representatives, environmental and recreational interests.

Q 8d Do you have any other comments on this policy?

The LUS, if delivered effectively, has the potential to streamline land use policies across sectors, identifying overlaps or conflicts in priorities, potential partnerships and delivery of multiple benefits. Therefore, Scottish Government should make every effort to facilitate its delivery. Investing initially in regional land use partnerships should save money in the long term by facilitating a more holistic and coordinated approach; enabling better targeting of public money spent on forestry expansion, renewable energy development, SRDP, urban development and other land uses.

Q 9a Do you think that regional land use frameworks could be useful to inform regional/local land use decision-making?

Yes. The Land Use Strategy sets objectives at a national scale and does not set out to define how land can be used at a local level. It claims to provide a framework for local decision making and relies on the National Planning Framework and Scottish Planning Policy to provide a platform for drafting of development plans¹. However, LINK does not believe that the LUS is currently being translated effectively at regional or local scales and that the revised Strategy must build a more robust framework for this to happen. The national LUS must be supported by a regional and local framework for delivery, which takes account of specific conflicts, pressures and solutions. Lessons learned from the regional pilots should help to inform this process. The National Planning Framework, National Marine Plan and Scottish Forestry Strategy also involve a regional approach so it makes sense to do the same within the LUS, preferably in cooperation with the other regional plans.

Q 9b Which aspects of this approach do you think require further development?

Much more emphasis must be placed on securing and delivering positive land use change through the revised LUS. This could be done more easily at the regional or local level so Scottish Government must commit to initiating a delivery phase of the existing land use pilots and future regional frameworks. A fundamental element of these regional frameworks will however be the implementation in each of a national ecological network.

Q 9c Do you have any comments on this proposal?

We don't believe it is sufficient for the regional land use frameworks to focus purely on rural areas. A land use framework should cover all land within that region and will require better join up with the planning system, including issues such as green belt land for example.

¹ Scottish Government (2011). Getting the best from our land: A land use strategy for Scotland. Scottish Government. UK.

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Q 10a Do you think that land use mediation or facilitation could be useful in a land use context?

Yes facilitation will be important, particularly in the initial stages of development of regional land use partnerships, land use frameworks and as initiatives move towards delivery. Mediation should only be required if an issue is particularly contentious.

Q 10b Please provide your reasons for your answer.

In what is designed to be a consensus-building exercise of this type, with no intention or indeed authority to dictate to people what they do with their land, the need for mediation should very rarely, if ever, arise. But someone who can bring people together and inform and guide their discussions is likely to be indispensable. As mentioned previously, in development of the land use pilots, facilitation was vital to enable open dialogue about stakeholder priorities, concerns and opportunities in a region or locality.

Q 11 Do you have any suggestions on other potential measures to encourage climate friendly farming and crofting?

Agriculture and related land uses were the second largest contributor to Scotland's total Greenhouse Gas (GHG) emissions in 2012, responsible for 21% of the total². To meet 2050 GHG targets large-scale change to farm practices, systems and food consumption will be needed – not just short-term efficiency savings. This will require action before 2032, and preferably immediately, if Scotland is to truly become an exemplar and leader in green farming³.

A major challenge is to reduce GHG emissions from food production. Scottish Government is currently reliant on market forces and the voluntary Farming for a Better Climate Initiative (FFBC). A lot of progress has been made through FFBC using the initial four focus farms, subsequently doubled to eight in 2014, to engage the farming community and demonstrate the benefits of improving efficiency. The website provides information on meetings, case studies and financial benefits of adopting measures to reduce GHG emission reductions. However, despite demonstrable benefits, uptake of the initiative remains voluntary and it is unclear how many farms have signed up. The RSPB recently published a report on the failure of voluntary approaches to deliver environmental outcomes⁴. Scottish Government should consider how the use of regulation and incentives could be used to maximise GHG emissions reductions.

² Scottish Government (2012). Scottish Greenhouse Gas Emissions 2012. An official statistics publication for Scotland. <http://www.gov.scot/Resource/0045/00452084.pdf>

³ Scottish Government (2015). The Future of Scottish Agriculture. A discussion document. <http://www.gov.scot/Resource/0047/00479616.pdf>

⁴ The Royal Society for the Protection of Birds (2015). Using regulation as a last resort? Assessing the performance of voluntary approaches. https://www.rspb.org.uk/Images/usingregulation_tcm9-408677.pdf

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Q 12a Do you agree that more localised map-based ecosystems assessments could be useful to assist in informing funding decisions?

As per the experience of the current AECs scheme, even after just one assessment round, spatial targeting has its benefits but also disbenefits and limitations. It isn't, on its own, the answer to better funding allocation, it is part of a package that can improve funding allocation.

However, we support this intention and we have, to date, invested significant time and expertise into helping the government design targeted systems that have the potential to deliver biodiversity targets and other environmental goals. We look forward to working closely with the government in future to continue to progress this approach.

Q 12b Please provide your reasons for your answer.

- Spatial targeting is only ever as good as the data that has produced it – lack of data can result in maps that are heavily flawed or with too crude a resolution to be meaningful
- Drawing lines on maps is never perfect, there will always be situations where someone is included and someone excluded for no apparently sensible reason based on what exists on the ground, so caution should be taken against assuming spatial targeting is the end point – there is a need to maintain some flexibility and some element of ground truthing. A long enough and rigorous sense checking stage is essential if going down this route
- There are a range of approaches to targeting in general and spatial targeting at a landscape scale is just one approach. Spatial targeting isn't suited to all objectives/species/priorities. Other mechanisms that can help improve targeting are option eligibility criteria and guidance (helps target at a holding as well as landscape level), whole farm plans/environmental maps (the Farm Environment Assessment now part of AECs is part way towards this but not yet as comprehensive as could be and used as well as it might be to guide agreements and options choice), good advice is essential even when spatial targeting exists to ensure right option right place in combination with the right set of other options to meet genuine need – advice should be free to the land manager so the remit for the advisor should be best environmental outcome for public money spent rather than best financial return for work done as it can be when the land manager has to pay for advice; regional plans that set regional priorities and regional budgets allocated on understanding of regional need.
- In terms of improving allocation of funding efforts must also be made to reduce spend with limited additionality and public benefit i.e. spend on things that would have happened anyway AND spend on measures that help people meet existing regulatory baselines. All spend should be on additional management that would not have happened without intervention and yielding meaningful public benefit over and above the regulatory baseline.
- Attention needs to be paid to the *scale* of management required to make a real difference as well as where it needs to be. There may be, for example, less benefit in funding works on natural flood management in an isolated part of a catchment.

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- A scoring system has the capacity to undermine or reinforce any spatial targeting and this needs to be thought through.
- Too narrow an approach to spatial targeting can limit scope for new work and species range expansion.
- Targeting of SRDP funds should not just be about spatial targeting of AECs and FGS measures. These are two schemes within a much bigger programme and the funding in all of the schemes needs to be better targeted to need and programme priorities. Spatial targeting won't be the appropriate mechanism for all schemes.

Q 13a Do you agree that an assessment of ecosystems health and a spatial approach could be helpful to further inform targeting for the next SRDP?

Yes but see qualification below.

Q 13b Please provide your reasons for your answer.

An ecosystem services approach to spatial targeting should not be adopted INSTEAD of spatial targeting, based on habitats, species and landscape and cultural heritage features, it should be in addition too. Effective targeting in terms of management prescriptions within options and landscape and holding level spatial restrictions is essential for delivering species recovery. Agri-environment success stories like the Scottish corncrake would be in jeopardy if species were abandoned altogether in favour of ecosystem services.

Q 14a Do you agree that an urban pilot project could be useful?

We suggest that the National Park Plans could be used as a case study here, instead of investing in an urban pilot. The development of these plans will have dealt with both rural and urban issues.

Q 14b Please provide your reasons for your answer.

If, as we suggest in Q4b, the LUS and its Principles are made a material consideration in planning decisions then there is probably little more to be achieved from an urban land use pilot. The resources might be better invested in a delivery phase of one of the existing pilots or roll out of further regional pilots.

Q 15a Do you think that a strategic vision could be useful for the uplands?

Yes, this is essential and we would like to see Scottish Government commit to its development, rather than to "scope the potential to develop" one.

Q 15b Do you have any comments on this proposal?

Upland habitats are extensive in Scotland, with around 30% of the land area above 305m. Heather moorland, mires and blanket bog and poor quality grasslands all contribute to

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upland ecosystems, which deliver multiple ecosystem services⁵. Scotland contains one of the largest contiguous areas of blanket bog in the world⁶, which represents a vital carbon resource by capturing and sequestering carbon. As functional wetlands they can also alleviate flooding, provide a clean, secure and cost-efficient drinking water supply and provide an archive of cultural and environmental change. However, despite their importance, 80% of peatlands have been degraded in some way⁷ and 10% of them are now covered with non-native plantation forest⁸. Much of this damage was paid for by historical public subsidies. Land uses such as drainage, non-native commercial afforestation, burning, grazing and trampling by sheep and deer, vehicle use and domestic peat cutting have all had an impact on the functioning of Scottish blanket bogs. When bogs are damaged, the vegetation assemblages change and the habitat becomes less suitable for the species they once supported. Damaged bogs begin to release the carbon locked in the peat layer, which contributes to greenhouse gas emissions. Dissolved organic carbon is released into the water causing discolouration, which is costly to treat and has impacts on fish spawning. Peatland restoration is a cost-effective way of reversing the damage and restoring blanket bog function. It contributes to conserving a representative sample of natural and semi-natural habitats/species in the UK; helps halt biodiversity loss; delivers multiple benefits of sustainable land use and increases climate resilience.

Any exercise of the kind proposed should also take full account of the high landscape value of many of Scotland's upland areas, and of the diversity of their character across the country. These landscapes have long been recognised as being of outstanding quality – in many cases through designation as National Scenic Areas – and are widely prized, not just within Scotland, for their recreational potential. In this context it is important that national designation alone should not form the basis for decisions about value. Regional Parks, for example, are major environmental and recreational assets within easy reach of the country's main population centres. Likewise Wild Land Areas, which have now been mapped by SNH and which are mostly upland areas which have particular aesthetic, biodiversity, recreational and other features that contribute to Scotland's natural capital and ecosystem services on both a local and a global scale. Wild Land Areas are referred to in SPP and are a material consideration in upland planning.

Once again, current land-use policy must be better integrated – particularly regarding the way land is used for upland farming, forestry, game management (gamebirds, deer) and nature conservation – such that the natural environment and associated ecosystem services (provisioning, regulating, well being and cultural) are maintained and enhanced. The LUS must recognise other drivers of change and need to use/manage land accordingly. The

⁵ UK NEA (2011). The UK National Ecosystem Assessment. UNEP-WCMC, Cambridge. <http://uknea.unep-wcmc.org/Resources/tabid/82/Default.aspx>

⁶ Joint Nature Conservation Committee (1999). Information Sheet on Ramsar Wetlands (RIS). <http://jncc.defra.gov.uk/pdf/RIS/UK13003.pdf>

⁷ Bain, C.G., et al. (2011) *IUCN UK Commission of Inquiry on Peatlands*. IUCN UK Peatland Programme, Edinburgh. http://www.iucn-uk-peatlandprogramme.org/sites/www.iucn-uk-peatlandprogramme.org/files/IUCN%20UK%20Commission%20of%20Inquiry%20on%20Peatlands%20Full%20Report%20spv%20web_1.pdf

⁸ State of Nature: Scotland (2013) http://www.rspb.org.uk/Images/scotland_tcm9-345855.pdf

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Scottish Government needs to provide leadership to nurture and deliver meaningful change. The connection between land use and land ownership are particularly apparent in the uplands so any upland vision must be linked to the land reform process.

Q 16a Do you agree that the Land Use Strategy indicators are still fit for purpose?

It is difficult to know if the indicators are fit for purpose without some sort of assessment of how well they represented change secured by the first LUS. None of the annual progress statements refer to the indicators. Whilst information on trends illustrated by the indicators is available on the Land Use Strategy webpages, this is presented as raw data, with no effort to interpret relative contribution of actions resulting from the LUS or progress towards achieving the specific Objectives. Some of the indicators may not represent change that would be compatible with sustainable land management. For example, agricultural outputs and timber production may have an economic value and contribute to Scotland's prosperity but increased outputs will have environmental costs. The LULUCF indicator won't pick up the subtleties of this. Scottish Government must carry out an assessment of the indicators, how representative they are and how they can be reported to adequately demonstrate progress towards the LUS Objectives.

Q 16b Do you have any comments on the future monitoring of the revised Land Use Strategy?

Scottish Government publishes annual LUS Action Plan progress statements, outlining delivery against objectives. It is difficult to assess the progress that has been made towards delivery of the LUS Objectives because many of the actions proposed are not Specific, Measurable, Achievable, Realistic and Time Bound (SMART). They were also *input* focused rather than *outcome* focused. This means that, in many cases, the progress statement only states whether or not the planned actions were completed and does not assess their contribution to achieving the LUS Objectives. Lack of available data further complicates this assessment and the progress statement fails to capture or address the issues hindering progress. Targets and actions flowing from the LUS must be SMART and *outcome* focused. Future progress reviews must fully investigate progress against actions, identifying and finding solutions to barriers to delivery.

Q 17 Are there any other activities that you think we should be undertaking to achieve better understanding and application of the Principles or delivery of the Strategy?

Guidance on the application of LUS Principles in regulations and incentives should be completed as a priority.

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Please Note this form **must** be returned with your response to ensure that we handle your response appropriately

1. Name/Organisation

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3. Permissions - I am responding as...

Individual

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Group/Organisation

Please tick as appropriate

(a) Do you agree to your response being made available to the public (in Scottish Government library and/or on the Scottish Government web site)?

Please tick as appropriate

Yes No

(c) The name and address of your organisation **will be** made available to the public (in the Scottish Government library and/or on the Scottish Government web site).

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(b) Where confidentiality is not requested, we will make your responses available to the public on the following basis

Please tick ONE of the following boxes

Are you content for your **response** to be made available?

Please tick as appropriate

Yes **No**

Yes, make my response, name and address all available

or

Yes, make my response available, but not my name and address

or

Yes, make my response and name available, but not my address

(d) We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

Please tick as appropriate

Yes

No

What are your main areas of interest? Please tick up to **three** boxes.

- Farming
- General land management (or interest in a combination of land uses)
- Local community
- Forestry
- Deer and game management
- Recreation and tourism
- Environment
- Biodiversity
- Education

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- Cultural heritage
- Other - please specify



All of the above have an impact on the environment so we are interested directly and indirectly in all areas

FOR ORGANISATIONS ONLY Please indicate which category best describes your organisation. (**Tick one only**)

- | | | |
|--|--------------------------|-------------------------------------|
| • Public sector – national or local government | <input type="checkbox"/> | |
| • Other public sector | | <input type="checkbox"/> |
| • Third sector | | <input checked="" type="checkbox"/> |
| • Private sector | <input type="checkbox"/> | |
| • Academic or research body | | <input type="checkbox"/> |
| • Representative body for professionals | <input type="checkbox"/> | |
| • Other - please state | | |

The following Scottish Environment LINK members endorse this response:

- Association for the Protection of Rural Scotland
- Buglife
- Butterfly Conservation
- Froglife
- North East Mountain Trust
- Nourish Scotland
- Plantlife
- Ramblers Scotland
- RSPB Scotland
- Scottish Badgers
- Scottish Campaign for National Parks
- Scottish Wild Land Group
- Wildfowl and Wetlands Trust
- Woodland Trust