



Summary

Nature is in crisis and Scotland faces challenges of climate breakdown, all while building a green recovery in response to the Covid-19 pandemic. The scale and urgency of what is required to deliver real improvements for people and nature requires bold ambition from Scotland's decision-makers. The next Scottish Government will be responsible for taking us halfway to meeting Scotland's ambitious 2030 climate target and delivering action on the ground to drive nature's recovery.

This manifesto sets out key policies and actions that the next Scottish Government must commit to in order to address the nature and climate emergency, including the following priorities:

- **A Nature Network for Scotland**, delivering bigger, better, more joined up sites for nature and creating links for wildlife and habitats through the National Planning Framework.
- **An ambitious Environment Act that includes legally-binding targets for nature's recovery.** Ambitious legislation is needed to set targets to clean up our air, soils, seas and rivers, with policies to deliver the recovery of Scotland's natural habitats and to increase biodiversity.
- **A plan for ocean recovery**, where at least 30% of Scotland's seas are highly protected (of which at least a third is fully protected) from extractive activities by 2030, with new legislation to underpin a world-leading climate and nature friendly fishing industry.
- **Sufficient funding to address the nature and climate emergency.** Increased funding for Scotland's public environment agencies and research institutes is needed, while new models to leverage private investment are required for a green recovery.
- **Legislation and policies to decarbonise and build a Circular Economy**, with large-scale investment to meet climate targets and restore nature, moving beyond the 'take-make-waste' economic model and focusing on reducing our environmental impact including tackling single-use plastics.
- **Protections for our peatlands**, including implementing a ban on peat extraction and sale for horticultural use, as well as a ban on burning of peatlands and the introduction of a licencing regime for muirburn in Scotland's uplands.
- **Developing Regional Land Use Frameworks by 2023**, with input from a wide range of stakeholders to set out regional land use priorities and funding requirements.
- **Introduce a new Deer (Scotland) Act to bring deer management into the 21st century**, making the most of Parliament's powers to manage unsustainable numbers and contribute to meeting climate and nature goals.
- **At least 50% of all woodland expansion should be with native species and at least 10% delivered through natural regeneration.** The expansion and restoration of Scotland's native woodland provides a route to decreasing carbon emissions while providing long-term positive outcomes for nature.
- **Nature to be at the heart of future farming with funding arrangements to support this.** All farmers, crofters and land managers should contribute to achieving the protection, restoration and enhancement of Scotland's biodiversity and landscapes by 2030 through a new post-EU subsidy system.
- **Implementing the recommendations** of the independent Werritty Grouse Moor Review to establishing licencing for driven grouse shooting.
- **Eliminate wildlife crime** by fully resourcing a full-time Wildlife Crime Investigation Unit within Police Scotland to investigate wildlife persecution and enforce protections.
- **Establish a Scottish Invasive Non-Native Species (INNS) Inspectorate**, to ensure zero new establishments of damaging INNS in Scotland, by 2025.
- **Protect our freshwater habitats and species**, including by limiting development on floodplains to give more space for our rivers and coasts to move naturally and regenerate habitats.

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1. Introduction

Scottish Environment LINK is the forum for Scotland's voluntary environment community, with 40 member bodies representing a broad spectrum of environmental interests with the common goal of contributing to a more environmentally sustainable society.

Nature is in crisis. Human activity is driving dramatic declines in wildlife and habitats at rates never seen before. In Scotland, the state of nature is worrying with 49% of species decreasing and 1 in 9 under threat of national extinction.¹ Climate breakdown is further fuelling these trends as international efforts to deliver a net-zero society and provide a just transition face political hurdles. The scale and urgency of what is required to deliver real improvements for people and nature requires bold ambition from Scotland's decision-makers.

At the same time the Covid-19 crisis has revealed nature's importance as a lifeline for many, improving people's wellbeing during the most challenging of times. Scotland's global image has long been based on its stunning environments and iconic wildlife - this has been brought home with new appreciation for many during lockdown, along with abrupt changes that revealed unequal access to nature across society. There is common agreement that the 'old normal' wasn't working for many of us - or the environment - and there is a clear demand for a transformational green recovery from the pandemic that builds a prosperous economy centered around people and nature. Investing in nature can be a solution; improving people's wellbeing while sustaining our planet for future generations.

This election is vital. It will put in place the Scottish Government and Parliament that need to take us halfway to meeting Scotland's ambitious 2030 climate target as well as taking effective steps to drive nature's recovery.

At a time when our relationship with the EU and other international partners is changing, it is essential Scotland continues to maintain the highest environmental standards and does not let Brexit derail efforts to tackle the climate crisis and increase nature's resilience.

The following manifesto sets out key steps the next Scottish Government should implement for Scotland's land, seas and species and as part of a transformational green recovery.

¹ https://scotlink.org/files/state-of-nature-Report-Scotland_.pdf

2. Deliver a Nature-rich Scotland

With over 60% of the coastline and marine habitat, all the UK's arctic-alpine habitats, all the machair, Caledonian pinewood and most of the temperate rainforest, Scotland's nature is iconic. But the prospects are not good. The [2019 State of Nature report](#) highlighted negative overall trends, in the last decade in particular, and over the last 50 years' worth of statistically comparable data. This is set against ongoing longer-term declines that have been in train for even longer.

These trends are clear signals of the nature crisis in our country. Without species and habitat diversity, Scotland's ecosystems run much higher risks of collapse because their internal resilience is being stripped out. Resilience to adapt to change is becoming increasingly important as we face climate change and climate extremes. This combination of factors means that commitment to urgent, real and effective action is now badly needed.

The next Scottish Government must prioritise:

- **An ambitious Environment Act setting legally-binding targets for nature's recovery.** Ambitious legislation is needed to set targets to clean up our air, soils, seas and rivers, with policies that deliver the recovery of Scotland's natural habitats and increase biodiversity. These targets should include interim and long-term goals, with progress reports submitted to Parliament on a regular basis. Work to meet these targets should be overseen by Scotland's new environment watchdog, Environmental Standards Scotland, which will be in place from 2021. This Act should also place Scotland's Environment Strategy on a statutory footing to ensure nature recovery targets deliver its objectives.
- **A Nature Network for Scotland.** A Nature Network is a strategic, long term approach to manage, restore and enhance Scotland's habitats and landscapes. It is not a physical network like a path or hedgerow; it does, however, link the ecological processes that operate throughout the landscape, across managed landscapes and Protected Areas. Scotland's 2019 Planning Act sets a new direction for planning in Scotland: to manage the development and use of land in the long term public interest, defined as contributing to sustainable development, and to achieving the national outcomes, which integrate economic, social and environmental ambitions. There is also an opportunity to provide increased green urban corridors, including active travel routes and spaces for the public to access nature. A Nature Network is a key element of Scotland's infrastructure and can be delivered through the forthcoming National Planning Framework 4 (NPF4). A Nature Network across Scotland represents an investment in a wide-reaching natural solution with benefits for today's nature and climate emergency, as well as a thriving and resilient country.
- **Favourable condition for all of Scotland's protected nature sites by 2030.** Around 18% of Scotland's land is designated as protected² but this alone won't drive nature's recovery. Adequate funding for monitoring and management are urgently required to place all designated natural

² <https://www.rspb.org.uk/globalassets/downloads/documents/positions/safeguarding-sites/pressures-affecting-conservation-status-of-designated-natural-features-in-scotland.pdf>

features - from habitats and species populations to geological features - on a trajectory to favourable condition.

- **Establish a Scottish Invasive Non-Native Species (INNS) Inspectorate, to ensure zero new establishments of damaging INNS in Scotland, by 2025.** When people move animals and plants around the world and allow them, either deliberately or accidentally, to escape and establish in the wild, can result in serious negative environmental impacts. INNS are recognised as one of the 5 principal drivers of biodiversity loss across the world, damaging ecosystems, human health and the economy. INNS can spread quickly, preying on or outcompeting native species for food and space, spreading disease or altering habitats - these trends can also be exacerbated by climate change. Once INNS fully establish, it is vastly more difficult and costly to eradicate them. Investing in effective steps to avoid future establishment will be a prerequisite for delivering transformative change for nature and a sustained green recovery. Investment in a National INNS Inspectorate for Scotland would build long-term biosecurity and ensure response capacity to protect priority habitats on land and at sea.

3. Set Out a Plan for Ocean Recovery

Maritime heritage is key to Scotland's cultural identity and has played an important role in shaping our communities, particularly those on our over 90 inhabited islands. But despite their significance, climate change, unsustainable fishing, industrial development and pollution has caused widespread degradation across marine ecosystems.

Ten years ago, the hard-won and world-class Marine (Scotland) Act 2010 became law, requiring Scottish Ministers not only to protect, but also enhance the health of Scotland's seas. However, implementation of the Act is not fulfilling its full potential and may not be sufficient for delivering the scale of change needed to recover and protect the ocean in the face of the biodiversity and climate emergencies. UK administrations collectively failed to achieve Good Environmental Status (GES) for 11 out of 15 indicators under the UK Marine Strategy, with seabird populations in particular continuing to decline and the seabed in poor condition. International targets, such as the Convention on Biological Diversity (CBD) Target 6 (mirrored under the EU Common Fisheries Policy), requiring all stocks to be fished at sustainable levels by 2020, have also been missed. Whilst around 20% of Scotland's seas are included within a network of Marine Protected Areas (MPAs) the majority have limited or no management measures in place and are unlikely to enable significant ecosystem recovery.

With devolved responsibility for conservation in 61% of UK seas, the Scottish Government has the opportunity to make a difference, to be world-leading and set the international gold-standard for marine conservation and ocean recovery. The first step in realising this ambition is to recognise that business as usual is not an option. We cannot deliver the scale of change needed by just protecting the small hotspots of biodiversity we have left. Nothing short of transformative change in how we manage activities at and around the sea and in our ambition for ocean recovery, including restoration

of 'blue carbon' habitats and other nature-based solutions at scale, is needed. We must urgently follow scientific advice and transform the way we manage and use our seas if we are to safeguard our future.

The next Scottish Government must:

- **Create legally binding targets for ocean recovery**, placing environmental health at the core of decision-making at sea and on our coasts. The proposed Scottish Environment Act must enshrine ambitious targets for recovering our marine ecosystems by achieving and going beyond current targets for Good Environmental Status, including eliminating plastic and chemical pollution at source, and better regulation to reduce underwater noise pollution.
- **Strengthen the MPA network for ocean recovery**, committing to at least 30% of Scotland's seas being highly protected, at least a third of which are fully protected (therefore 10% of Scotland's seas), from extractive activities by 2030. This is essential to meet the ambition of international benchmarks. The Scottish Government must complete its much-delayed network of marine protected areas (MPAs), including new designations to fill current gaps and implementing management measures for all sites, and must greatly recover Priority Marine Feature extent and status outside the network. The Scottish Government should also establish an independent commission to advise on the developing MPA network, including reviewing network condition and resilience to climate change, transforming MPA management, identifying if new sites are needed to deliver ocean recovery and determining if new legislation is necessary.
- **Introduce new legislation to support a transition to a modern, world-leading climate and nature friendly fishing industry**. Unsustainable fishing and climate change are the most widespread pressures affecting the health of Scotland's seas. New legislation is urgently needed to: set binding targets to end over-fishing and eliminate the bycatch and entanglement of non-target and protected species; require fully documented fisheries delivered through Remote Electronic Monitoring (with cameras) to improve data collection and help to end Illegal, Unreported and Unregulated (IUU) fishing; improve inshore fisheries governance and transition to a new spatial management regime, which includes a presumption against trawling and dredging in a significant part of Scotland's inshore water and; introduce a new vessel licencing system that allocates fishing opportunities according to transparent and objective environmental, social and economic criteria to incentivise the most sustainable fishing practices.
- **Provide and incentivise investment in marine conservation and sustainability to match the scale of the nature and climate emergencies**. The sea and its resources are public goods and, given increasing understanding and public concern about the depleted condition of the ocean, the Scottish Government should increase its budget for conservation, including long-term marine monitoring programmes and MPA management plans, and investing more in science agencies and applied research. Regional Marine Plans that drive ecosystem recovery and restoration must be completed and resourced. Developing innovative finance models and scaling up

investment, including establishment and demonstrable progress of a Marine Nature Fund, into which all marine industries benefiting from public goods in, on or by the sea contribute to fund ocean restoration is key. The Scottish Government must utilise robust enforcement, such as fines for environmental damage, to encourage best practice.

4. Funding to Address the Nature and Climate Emergencies

In order to meet the challenges posed by the nature and climate emergencies, transformative change is required in the way funding for the environment is targeted. Considering the additional challenges the Covid-19 pandemic has brought to bear on the economy and public finances, it is more important than ever that funding for the environment is prioritised to contribute to a green recovery.

The transformative change required to reverse declines in nature and achieve Scotland's net zero climate targets, require government at all levels to act to improve environmental outcomes and to be underpinned by adequate funding. However, central government funding for Scotland's public environment agencies and environmental research has seen steep declines over the past decade.

The next Scottish Government should prioritise:

- **Increased funding for Scotland's environment agencies and environmental research.** From 2010-11 to 2019-20, budgets for SEPA, SNH and RESAS have been cut by 40% in real terms.³ These publicly funded organisations seek to investigate, understand, advise and provide evidence on ways of enhancing and protecting Scotland's environment. For them to tackle the nature and climate emergencies and fully contribute to a green recovery and reversal of funding declines is required.
- **A green recovery to be at the heart of the Scottish National Investment Bank's (SNIB) strategy.** The SNIB has the potential to leverage transformative levels of investment in projects that would deliver for nature and climate as well as create jobs as part of the green recovery from the Covid-19 pandemic. The Bank must focus on long-term projects that will transition Scotland to a wellbeing economy.
- **Funding for nature and climate through the post-Brexit UK Shared Prosperity Fund.** The UK Government has committed to a UK Shared Prosperity Fund to replace EU Structural Funds. Targeting this funding towards the environment could support projects to increase rural employment and training, to improve people's health and wellbeing and provide ecosystem services that we all rely on from clean water to carbon storage. This also includes funding to projects that can advance a just transition to a decarbonised, circular and inclusive economy, including renewables, energy efficiency and circular economy projects.

³ <https://www.scotlink.org/funding-the-nature-and-climate-emergency-reversing-a-decade-of-austerity-for-the-environment/>

5. Lead a Transition to a Resilient, Low-Carbon, Circular Economy

Economic policy in the next few years will be framed by the need to recover from the financial and societal impact of Covid- 19 response measures and the subsequent downturn. Economic recovery must also be framed by the urgent need to address the climate and nature crises. We need a green recovery where the need to meet climate change targets and restore nature is embedded across all functions of economic policy, mobilising investment steering us to a wellbeing economy that is resilient, zero carbon and circular.

Scotland's economic policy needs to be realigned so that policy hierarchy and coherence reflects the Sustainable Development Hierarchy and, more recently, the Doughnut approach.⁴ This involves recognising that we are bounded by planetary limits, including climate change and biodiversity loss; and we need to meet the needs of people through a sustainable economy that works for all.

At the core of our impact on the environment, is the sheer quantity of raw materials extracted to feed our demand for new products and the pollution produced from processing them. We need to reorientate our economy to one that is more circular and uses less virgin material. This means designing out pollution and waste, making much better use of the materials already in use, and regenerating natural systems. A recent Scottish poll shows very strong public support for this.

The next Scottish Government should:

- **Launch a large-scale investment programme to rebuild the economy and meet climate and nature targets.** One way the economy can be jump started is the 'Green New Deal': a large-scale programme of investment for economic recovery post pandemic, that improves wellbeing, protects, restores nature and meets climate targets. To form a Scottish 'Green New Deal', the Scottish Government should identify key domestic projects and programmes, which will be supported by a mix of public and private investment. This programme should be designed to create skilled jobs across rural and urban areas, through landscape, coastal and marine habitat restoration projects, green technologies and renewables and the circular economy.
- **Require public agencies and all companies receiving public funds to contribute to a just transition.** To sustain progress on meeting Scotland's ambitious climate targets while moving towards a wellbeing economy, all government spending should promote decarbonisation and restoration of nature as part of its objectives. Awards of public money, especially high-polluting sectors such as energy and aviation, must be conditional on the adoption of Just Transition Plans, which aim to protect jobs and support the workforce while driving a transition away from fossil fuels and promoting nature recovery.
- **Bring forward legislation and policies to build a Circular Economy.** Our economy must move beyond the current "take-make-waste" model and instead focus on reducing our environmental impact, making the most of materials we are currently using, while delivering positive society-wide benefits. The next Scottish Government must maintain the

⁴ <https://www.kateraworth.com/doughnut/>

commitment to deliver a Circular Economy Bill to set the framework to drive our economy to one that is more circular with legally-binding, long-term targets to reduce our carbon and material footprints. This must be underpinned by annual material flow accounts and a national Resources Reduction Plan to meet the targets and address the most problematic materials, with outcomes, milestones and aligned budget resource. Other measures which were proposed by the current Scottish Government to be included in a Circular Economy Bill should be committed to, such as charges on single use beverage cups, increase in carrier bag charges and setting a statutory obligation for local authorities to follow Scotland's Household Recycling Charter. The next Scottish Government must also commit to fully implement the EU Circular Economy Plan (2020).

- **Prepare a new Economic Strategy which delivers a just, circular and decarbonised economy.** The climate and nature crises demand that the objectives and priorities of Scotland's economic policy be aligned with climate targets and delivering nature recovery. Scotland's current Economic Strategy directs only a minor part of total government support to Zero Carbon or circular economy initiatives. Further, without the requirement to decarbonise and restore nature being set out at the highest levels of strategy, many economic programmes work against each other, undermining progress, or at best make no contribution to resolving the climate and nature crises or improving wellbeing across society. A new Economic Strategy must be brought forward to set out how economic policies will improve wellbeing and reduce inequality while reducing environmental impact in a way that is compatible with the forthcoming Environment Strategy.

6. Secure High Environmental Standards

Our environment does not respect borders, but the way it is managed is determined by the legal structures, we humans put in place to govern it. With powers over the environment devolved to Holyrood, the Scottish Parliament and Government are the key actors in ensuring Scotland sets and maintains high environmental standards. But there remains a gap in ensuring political rhetoric turns into reality.

With the nature and climate crises already impacting Scotland's most sensitive ecosystems and species, it is vital that the next Scottish Parliament takes forward clear measures to ensure high environmental standards are maintained and exceeded wherever possible. Furthermore, as the economic recovery from the Covid-19 pandemic is rolled out in the years ahead, strong environmental regulations must remain in place to build resilience to a range of threats from climate change, flooding, biosecurity and food insecurity.

The UK's exit from the EU also poses a threat by removing the environmental safeguards we have had in place for decades. The current Scottish Government is taking forward steps to keep in place crucial EU environmental principles and governance measures and this commitment must remain in place over the next five years. Scotland has an opportunity to lead the way in the UK, driving a 'race to the top' in implementing high environmental standards.

The next Scottish Government should:

- **Continue to maintain and exceed environmental standards post-Brexit with a strong, independent environment watchdog.** Environmental Standards Scotland (ESS) is expected to be established on a permanent basis in 2021. The next Scottish Parliament must ensure the watchdog has the resources it needs to investigate complaints of environmental damage raised by individuals and community groups. The next government must also commit to using the keeping pace power in the UK Withdrawal from the EU (Continuity) Bill to ensure Scotland keeps aligned with positive environmental law developments in Europe. In general, Scotland should strive for positive cooperation on environmental issues with neighbouring countries and uphold international environmental standards.
- **Enshrine the right to a healthy and safe environment in a Human Rights (Scotland) Bill.** Access to a healthy environment has been recognised as a fundamental human right and securing it is vital for realising people's other rights. Following the UK's exit from the EU, Scotland must continue to uphold human rights by enshrining these in a new Human Rights (Scotland) Act. This legislation should include both substantive rights and procedural rights: the substantive right of everyone to benefit from healthy ecosystems and environmental quality; and full compliance with the Aarhus Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters – this should include provisions that ensure individuals and communities have access to 'fair, equitable, timely, free or inexpensive' justice through the Scottish legal system.
- **Commission a review of use of existing environmental powers.** Environmental policy has been devolved to Holyrood for over 20 years with progress in several areas being made in that time. Yet, Scottish Ministers have not yet used the full range of powers available to them and this risks a growing gap between political rhetoric and the reality of environmental action on the ground. ESS should be commissioned to review the use of existing environmental powers in Scotland for government and parliament to prioritise future action and funding allocation.
- **Establish a specialist Environmental Court.** In response to the growing importance of environmental law, as well as the need for improved access to justice, a specialist Environmental Court would allow Scotland to provide an exemplary environmental justice system, compliant with the international Aarhus Convention, within our own unique legal framework. There are nearly 1500 environmental courts or tribunals at national and state/province level over about 50 countries around the world, and Scotland is lagging behind. The next Scottish Government should bring forward legislation to establish an Environmental Court for more consistent, certain and speedier judicial decisions to secure better outcomes for the environment.

7. Deliver a Transformation in our Planning System

Scotland's 2019 Planning Act set a new direction for planning in Scotland. For the first time, planning has a defined purpose: to manage the development and use of land in the long-term public interest. This includes contributing to sustainable development and achieving national outcomes to improve economic, social and environmental conditions. The next Scottish Government and Parliament will lead on developing the next National Planning Framework (NPF4) – a high-level vision for planning for the next 10 years. The direction set by NPF4 will be critical for enabling Scotland to achieve its ambitious target of achieving a 75% reduction in greenhouse gases by 2030 and reversing declines in natural habitats and wildlife. The NPF4 must be the foundation of a transformative planning system that sets out how we can live well within our planetary boundaries.

Future planning policy must also tackle the inequality built into our existing planning system, including delivering new social housing and affordable homes, giving communities more of a say in how their neighbourhoods are developed and delivering improvements in our quality of life. The planning system must also closely align with Scotland's Land Use Strategy, which sets out the principles defining public interest in the use of land, and Regional Land Use Frameworks which will translate this into practical action on the ground.

From 2021, all parliamentarians have an opportunity to put in place policies in NPF4 for intelligent development to take place from now until 2050, enabling a transition to a net-zero, nature-positive and resilient Scotland.

The next Scottish Government must:

- **Deliver a Nature Network for Scotland.** A Nature Network means having bigger, better, more joined up sites for nature and considering the nature and climate emergency, it is critical we take a strategic approach to how we manage our natural environment. As part of NPF4, a Nature Network must be taken forward as a national development, allowing future planning decisions to be informed by which areas of land could deliver the most for nature. *For further detail see section 2.*
- **Develop principles for how new developments can contribute positive effects for nature.** Planning policy should require new developments to deliver positive effects for biodiversity, increasing the resilience of our natural world. Developers should be guided to seek positive outcomes for nature and wildlife as part of their developments, rather than simply look for low-cost solutions to mitigate environmental harm. A set of new principles are required to ensure nature benefits from planning decisions.
- **A ban on the commercial extraction and the sale of peat for horticultural use.** Restoring Scotland's peatlands is vital for meeting our net-zero climate target, protecting rare bog habitats and delivering a healthy freshwater environment. However, peat extraction for the horticulture industry continues in Scotland, supplying around 60% of the UK's production despite alternatives being available. The planning system facilitates peat extraction for horticulture and other uses but this significantly undermines Scotland's peatland restoration

ambitions. In the next Parliament, NPF4 must update planning policy to ban licences for peat extraction for horticulture, repeal all existing licences by 2023 and support the restoration of existing extraction sites.

- **Stronger protection for greenbelts and wild land.** Planning needs to protect the greenspaces close to homes that we visit every day as well as ensure our most sensitive landscapes and ecosystems are protected from inappropriate and damaging development. Scotland's eleven greenbelts protect and enhance the landscape of the towns and cities they surround as well as improving quality of life. However, the integrity of greenbelts is under constant threat, primarily for housing development. Stronger protections must be given to green belts, both extending existing ones and designating new ones. Similarly, the planning system must realise the benefits for protecting and restoring Scotland's most scenic wild landscapes, continuing to use the Wild Land Areas map as a spatial framework.
- **Equal Right of Appeal for our communities.** Planning must enable citizens to exercise their rights when it comes to planning decisions affecting them. Based on the principles of the Aarhus Convention, which Scotland has committed to uphold, people should have the right to information and participation in planning decisions, as well as the right to challenge a development application. The current system is skewed in favour of developers, allowing them to lodge appeals when applications are refused. But communities currently have no equal right to appeal decisions that negatively impact on the quality of their local environment. The next Parliament should introduce an Equal Right of Appeal in planning.
- **A national housing audit.** The system for delivering new housing development does not meet our needs. Instead of being guided by communities, development is led by market forces responding to financial incentives. Scotland already has the majority of the housing that will be in place in 2045 to meet the net-zero target. The greatest need is therefore for the effective adaptation of properties to meet current and future needs, conserving the embedded carbon in these properties. A national housing audit should be introduced to determine the quality of existing housing stock and assess how major new housing settlements make a positive contribution to meeting net-zero goals, improving biodiversity and contributing to quality of place.
- **Removal of permitted development rights for hilltracks.** Vehicle tracks built for agricultural or forestry purposes benefit from permitted development rights and do not require full planning permission. However, for decades there has been concern that this privilege has been exploited causing widespread landscape and environmental damage in the uplands. Lack of oversight through the planning system has led to a democratic deficit, with no opportunity for the public to comment on the prior notification which is now required to create new tracks. The next Scottish Parliament should recommend that full planning approval be required for tracks built for agricultural purposes.

8. Deliver Renewable Energy while Protecting Nature and Landscapes

It is vital Scotland makes progress on achieving its net-zero climate targets. With ambitions for at least 50% of Scotland's total energy consumption to be met by renewables by 2030 to help decarbonise our heat, transport and electricity demands, national planning policy has an ever-greater role to play in guiding where renewable energy development and associated infrastructure should be built.

Efforts must be made to firstly reduce our overall energy consumption by following the energy hierarchy approach. We must then ensure the renewables that are required to meet this demand do not proceed in a manner, nor in areas of Scotland, that undermine our ability to address both the nature and climate emergency through ecological recovery. Energy production in Scotland can also have a significant impact on Scotland's beautiful and varied landscapes and the adverse impacts of renewable developments on this vital resource must be minimised. Energy production must be truly sustainable to ensure the quality and ecological functionality of Scotland's landscapes is maintained and enhanced.

Specifically, the following actions are required:

- **Develop a spatial strategy to deploy new renewable energy generation without harming nature.** The fourth National Planning Framework will be agreed during the next session of the Scottish Parliament. This Framework must set out a spatial strategy for the sensitive deployment of increased renewables, protecting areas of high ecological importance and restoration potential from large developments. A 'Renewables Delivery Package' to guide increased investment in independent research, surveying and monitoring is needed to identify the least environmentally sensitive site for renewables. This would balance the need to meet net-zero climate targets without creating new or exacerbating existing environmental pressures.
- **A ban on all new fossil fuel developments** to be included in the next National Planning Framework.
- **Large biomass plants must not be classed as renewable generation.** We must work to meet climate targets without increasing demand for intensively produced biomass stock.

9. Take a New Approach to Land Use

The way our land is managed has huge consequences for how we live our lives and the benefits we derive from the land. Considering the nature and climate emergency, experts on the government's Committee on Climate Change have warned we will only meet Scotland's ambitious emissions reduction targets if there are significant changes to the ways we use our land. Land is a critical asset for leading us through the nature and climate emergency and building a green recovery.

Land can deliver multiple benefits: from growing our food and producing timber to storing carbon emissions and reducing flooding. Access to land is also vital for maintaining physical and mental health,

from outdoor activities, and being a source of inspiration for Scotland's creative cultures and providing spiritual uplift. Our land also hosts a wide variety of habitats, being a home for Scotland's many plant and wildlife species and provides the stunning landscapes for which Scotland is known the world over. But our land is often managed in ways that perpetuate environmental harm, including intensive crop production and muirburn. Scotland in fact has more potential to manage land in ways that can reduce climate emissions and tackle the nature crisis quicker than can be done in other parts of the UK – from a huge expansion in native woodland to agroecological farming practices.

Scotland's exceptionally concentrated pattern of land ownership has made it all the more difficult to ensure that its management pays adequate regard to the very wide range of public interests that it affects, from carbon emissions and sequestration to the wellbeing of local communities and recreational users. Much of the way we currently use the land in Scotland is not sustainable and reform could deliver huge economic, social and environmental benefits. LINK members believe land reform must drive a change in social attitudes so that managing the land in ecologically sensitive ways is of equal importance as tackling societal inequality. Land reform must form an ongoing national conversation about how we can balance the relationship between people and land in order to achieve sustainable development.

A new approach to land use is required to realise these benefits in the next five years, guiding us to make better land use choices now and in the future. Implementing sustainable land use policies can deliver more benefits from our limited land resources and deliver better outcomes for people and nature. LINK members recommend the next Scottish Government implements the following actions:

- **Meet the commitment to develop Regional Land Use Frameworks by 2023.** The next Scottish Government must drive forward the creation of Regional Land Use Partnerships, representing a wide range of stakeholders, and support them to create a set of recommendations for regional land use priorities and funding requirements, clearly and explicitly linked to the new Regional Spatial Strategies introduced by the 2019 Planning Act. The Scottish Government should use these recommendations in its decisions to allocate and target public funds and to develop future policy.
- **Introduce a ban on burning on peatlands and introduce a licencing regime for muirburn in Scotland's uplands in favour of sustainable land management practices.** Regular burning of Scotland's upland landscapes is carried out to maintain conditions for intensive driven grouse shooting. Regular burning degrades the upland habitat and drives out other wildlife. It also causes considerable damage to Scotland's precious and unique peatland habitats which are vital for storing carbon and aiding efforts to meet our ambitious climate targets.
- **Review different models of land tenure to maximise the public benefit from land.** Establishing and maintaining the right relationship between people and the land is fundamental to Scotland's long-term wellbeing. New models of tenure are needed which reflect and embody a mix of private and public interests, and with accompanying objectives to guide the future use of land across the country. The nature and climate emergency underscore the importance of creating new models of tenure are created to collectively make the best use of this most basic resource. A review of models of land tenure is needed to move Scotland further along in managing land in environmentally sustainable ways.

- **Establish new National Parks.** Our National Parks lead the way in tackling the nature and climate emergency, providing a gateway to the outdoors, delivering mental and physical health benefits and boosting rural employment. Our parks celebrate the very best of Scotland's world-class landscapes. These benefits should be extended to other parts of Scotland and LINK supports the calls from the Scottish Campaign for National Parks and The Association for the Protection of Rural Scotland for more areas to be designated, starting with Galloway and the Borders to widen our network of protected landscapes.
- **Reverse funding declines and improve management of Scotland's protected landscapes.** There has been an ongoing run-down of attention and funding for Scotland's three remaining Regional Parks and our National Scenic Areas require more robust management. Neglect of both these categories of protected landscape has resulted in their losing their international recognition by the IUCN. Greater priority and care must be accorded to all Scotland's landscapes in line with the recommendations of Scotland's Landscape Alliance.

10. Implement Sustainable Deer Management

For over two centuries, the red deer stag has been an iconic symbol of Scotland's uplands. However, for many decades there has been a scientific consensus that unsustainably high deer densities have a destructive impact on vast areas of our land, preventing regeneration of habitats, especially woodlands, that would otherwise provide for a broad range of species. In the face of the nature and climate emergency the current excessive deer numbers in our uplands is unsustainable and fundamental changes are needed in the way Scotland manages its deer population over the next decade and beyond.

Sustainable deer management can help tackle the climate and nature emergency by restoring ecosystem services, especially in the uplands, and has a crucial role to play in delivering nature-based solutions to climate change. Reducing deer numbers would deliver positive outcomes for a range of nature recovery projects including woodland expansion, peatland protection and restoration, enhancing the condition of protected conservation sites, as well as positive benefits for society including reducing the incidence of Lyme disease and vehicle collisions.

The Scottish Government and Scottish Parliament have the power to make great strides forward in the way our land is managed from 2021 onward. We need bold ambition to drive us to meet our ambitious climate targets, expand and diversify our woodlands and increase populations of other wildlife species. A repurposing of existing deer management legislation could open doors to regenerate the economies of our most fragile rural areas, helping re-population of Scotland's glens and allowing communities real influence over how their local landscapes are managed.

In the next parliamentary session, the Scottish Government should:

- **Fully implement the recommendations of the 2020 Deer Working Group report.** The Government's independent advisers have recommended nearly one hundred steps that

should be taken to reform deer management, including setting limits for maximum deer density per km², increasing the amount of time in the year deer can be culled under license and ending muirburn as part of deer management. LINK members fully endorse these recommendations and urge for their implementation to be brought forward early in the next Parliamentary session.

- **Introduce a new Deer (Scotland) Act to bring deer management into the 21st century.** New legislation is needed to consolidate the recommendations of the Deer Working Group, making the most of the Parliament's legal powers to enforce deer culls and manage unsustainable numbers. In order to meet climate and nature recovery goals, deer overpopulation can no longer be allowed to hamper efforts to increase Scotland's woodland and peatland cover, which are vital to meeting the environmental challenges of the coming decade.
- **Phase out public support for deer fencing.** Our vast upland landscapes have a vital role to play in meeting our climate targets and drive nature's recovery. 12 million tonnes of CO₂ are absorbed by Scotland's forests and woodlands every year – around the level of annual emissions from vehicles in Scotland. But woodland expansion targets can only be achieved through a major reduction in deer numbers. Currently, woodland expansion relies upon publicly-funded and high cost deer fencing – a 'sticking plaster solution' which limits public access, visually scars the landscape and concentrates damage from deer in the areas outside the fencing. This effectively prevents hard discussions about the need to reduce deer numbers from happening. This is no longer sustainable as part of a green recovery and phasing out of public support for fencing must align with the implementation of new statutory deer management duties.
- **Deliver more rural jobs in deer management.** Lower densities of deer would require more stalkers. Drawing upon the existing skills and expertise across public, private and voluntary sectors, deer management could be expanded to include community models of hunting as widely practised in Europe, giving an economic and social boost to our most sparsely populated areas and contributing to a green recovery.
- **Fully integrate deer management with wider land use planning and incentives.** Deer management should be considered as part of land use planning and Regional Land Use Frameworks. By fully integrating it wider land use planning, deer management can contribute to the delivery of wider public objectives including woodland expansion, peatland restoration and climate change adaptation.

11. Expand and Regenerate our Woodlands

Now more than ever, the potential for trees and woodlands to provide multiple benefits is being recognised. A significant part of our response to the twinned dangers of climate change and biodiversity loss can come from realising the full potential of trees and woods to draw down carbon and to support wildlife-rich ecosystems. It is, however, important to recognise that expanding woodland cover is not appropriate everywhere - our open habitats, including deep peat and species-rich grasslands are vulnerable to inappropriate planting and invasive seeding of non-native conifers from commercial plantations. They must be preserved for our rarest species and carbon sequestration, an approach often summarised as 'the right tree in the right place.' With the right balance of aspirations for woodland expansion and bolstering the resilience of our existing woods, we can also create significant benefits in the form of ecosystem services, increased rural job creation, the economic value of forest products, and the opportunities to improve our physical and mental wellbeing.

Priorities for the next Scottish Government should include:

- **At least 50% of all woodland expansion should be with native species and at least 10% of the overall target for woodland expansion should be delivered through natural regeneration.** We need to focus the expansion and restoration of Scotland's woodland on the two fundamental challenges our environment faces - nature recovery and climate change. Natural regeneration provides the lowest cost and lowest carbon emissions release route to woodland expansion and carbon sequestration. It also produces the best long-term outcomes for biodiversity and the strongest resilience against climate change and tree pests and diseases.
- **Introducing a premium grants incentive for planting high value timber species and providing greater support for forest management to deliver quality timber.** The incentives for forestry in Scotland should be reviewed to encourage diversification of forestry into working woods managed in nature-friendly ways. This will provide high quality forest products and support for forestry-related SMEs to create jobs in rural communities and help money to circulate in local economies. Diversifying forestry in this way delivers added benefits by increasing forest resilience to climate change, pests and diseases, driving investment into creating new working woodlands and promoting forestry practices which conserve more soil carbon and benefit biodiversity. The National Forest Estate can lead the way by showcasing what this looks like in practice and making more of the Estate's timber available to small processing businesses from productive forests.
- **Supporting the restoration and expansion of Scotland's rainforest.** The next government must prioritise the rainforest as it can be a nature-based solution to the climate crisis. The restoration and expansion of the rainforest can support the local rural economy, a thriving environment, and healthy and flourishing communities. Scotland has some of the best remaining rainforest sites in Europe and we owe it to the world to protect them. But this habitat is under threat from invasive non-native species such as rhododendron and browsing by deer. Our rainforest can be a nature-based solution to the climate and nature crises if the next Government commits to the restoration of this habitat which is incredibly rare on a global

scale. When it comes to the rainforest we need it to be bigger, better and more joined up and this will also help meet climate and biodiversity targets. There are also job creation benefits associated with deer management and rhododendron clearance which would greatly improve this habitat.

- **Resourcing local authorities to deliver at least 20% urban tree canopy cover close to where people live and where most benefit would be delivered to communities.** Urban forestry has a wide range of benefits including improving air quality, managing rainwater and providing health and wellbeing benefits to people. During the Covid-19 lockdown, where accessible to them, people have found much needed respite in nature and in woodlands. But the lockdown restrictions have also highlighted the unequal access to good quality greenspace and woodlands, particularly in areas of highest deprivation. Everyone must have the opportunity to benefit from the wonders of nature. We need to bring urban forests closer to where people live and make them accessible, while continuing to make space for other valuable urban greenspaces such as wildflower meadows.

12. Place Nature at the Heart of Food and Farming

Globally, food production and consumption are key drivers of habitat loss and wildlife declines. In Scotland, agriculture has a direct impact on three quarters of our land and has a significant influence on the environment and landscapes. On some farms and crofts, landscapes and wildlife habitats are flourishing but widespread intensive farming practices are driving an overall negative environmental impact. Farming practices can work with nature and, where it does, they build resilience in local communities, protect nature and provide local products and business opportunities.

Scottish farmers and crofters are also on the front line of climate change. Extreme weather poses increasing challenges for livestock raising and crop yields. However, the sector is also a large contributor to Scotland's greenhouse gas emissions and the ways that land is managed can have profound effects on biodiversity levels. Farming has also had a major, and often dominant, role in shaping Scotland's landscapes - for good and for ill.

How we use and manage Scotland's land has a central part to play in tackling climate change, restoring nature and maintaining flourishing landscapes – it must be a central element of the green recovery. All farms and crofts have a role to play in this and the urgency of the nature and climate emergency means progressive policies are needed now. By reducing emissions and managing land to store carbon, by practicing nature-friendly farming and by maintaining and creating wildlife habitats and unique landscapes, farmers and crofters can make a positive difference.

LINK proposes the following steps to be taken by the next Scottish Government:

- **Nature to be at the heart of future farming with funding arrangements to support this.** All farmers, crofters and land managers should contribute to achieving the protection, restoration and enhancement of Scotland's biodiversity and landscapes by 2030. A new post-

CAP/post-EU funding system must enable farmers to take action to benefit nature and reduce climate emissions, including implementing agroecological approaches and high nature value practices. New legislation must be brought forward in the next Parliament to set up a new funding system for farmers, crofters and land managers to underpin a thriving agricultural sector that champions outdoor reared, grass-fed livestock (cows and sheep) ahead of indoor grain-fed livestock farming, and supports more fruit and vegetable growing in Scotland.

- **Repurpose the Farm Advisory Service to focus on climate and nature.** High quality support will be needed for farmers, crofters and land managers making a just transition to new climate and nature-friendly farming. We must place confidence in farmers to create a more resilient farming system by supporting and enabling them to restore nature, improve soil health, tackle climate change, and close nutrient and waste loops. Upskilling of advisers is urgently needed so that they can provide advice on a broader remit and help deliver the transformation to net-zero and nature-friendly farming that is urgently needed. Particular attention should be paid to advising new entrants to farming to maximise sustainable farming businesses as part of a green recovery.
- **Bring forward a Good Food Nation Bill.** Covid-19 exposed the weaknesses of our ‘just-in-time’ food supply systems. The Good Food Nation Bill must underpin an integrated food policy which reduces the environmental impact of the Scottish shopping basket; ensures everyone can afford and access healthy, sustainable food; enables healthy and nutritious diets; boosts the local food economy and shortens supply chains; tackles food waste; and supports fair work and high animal welfare standards.
- **A priority for local and organic food in public procurement.** National and local government must lead the way in procuring sustainable food in its schools, hospitals, care homes and other facilities. Public procurement is one of the most powerful mechanisms for driving a transformation in food culture and public health. The next Scottish Government must set clear targets on the procurement of local and/or organic food that is climate-friendly, nutritious and meets high environmental and animal welfare standards. This supports the delivery of the duties set out in the Procurement Reform (Scotland) Act 2014, including targets for local and organic food.

13. Eliminate Wildlife Crime in Scotland

Scotland’s iconic wildlife species are cherished by many Scots and known the world over, attracting tourists and bolstering Scotland’s reputation as a haven of natural beauty. However, some of our beautiful wildlife species and habitats are regularly persecuted and destroyed, undermining our reputation for high environmental standards and furthering the nature crisis. A lack of resources, commitment and experience across public agencies combined with procedural difficulties and data inconsistencies, have led to our wildlife and public being let-down in efforts to eradicate the scourge of wildlife persecution.

This must end. From badgers, bats and birds of prey to whales, dolphins and freshwater pearl mussels, our wildlife species deserve to flourish free from cruelty. Our wildlife protections must be strengthened and those with a duty to protect wildlife must be fully funded and resourced.

The next Scottish Government should:

- **Fully resource Police Scotland to investigate wildlife persecution and enforce protections.** A full-time Wildlife Crime Investigation Unit, with dedicated Wildlife Crime Officers in place, must be established to give this work priority status. This would ensure time and resources are available to fully investigate wildlife crime offences and act as a deterrent to potential offences. Wildlife Crime Officers should be able to progress their career and be promoted within the Unit to ensure skills and experience are not lost to other areas of policing.
- **Introduce legislation for grouse moor licensing to protect Scotland's birds of prey.** There is substantial evidence that management of grouse moors for intensive 'driven' shooting threatens birds of prey, with numerous cases of satellite-tagged golden eagles going missing in suspicious circumstances. LINK supports the recommendation of the Werritty Review that licensing for grouse moors should be introduced but disagree with the suggestion that a five-year moratorium be put in place before proposals are brought forward. The next Scottish Government should prepare to immediately introduce legislation for grouse moor licensing to adapt moor management to modern day expectations and address public land use priorities.
- **Launch a thorough review of wildlife crime data collection and options for stakeholder engagement.** The Partnership for Action Against Wildlife Crime Scotland (PAWS) should be reviewed to investigate inconsistencies in annual wildlife crime reporting data and explore options for wider stakeholder engagement, including eNGOs.
- **Funding for Scotland's Ranger Services.** The long-term decline in the number of Ranger posts across Scotland - a reduction of over one hundred posts (35%) since 2008 - has put our wildlife at risk. Rangers are on the frontline of maintaining our natural heritage and assisting visitors to our green places. Rangers hold important roles in environmental education, conservation and community engagement, key functions for increasing the public's appreciation of wildlife. A new sustainable funding model would support and further develop Ranger Services as part of a green recovery, bringing with it the opportunity to engage and train young people in this popular career choice.

14. Protect our Freshwater Habitats

Freshwater biodiversity is in decline not only in Scotland but also globally. For some parts of our water environment, current targets and frameworks (or their implementation) do not go far enough to protect the unique biodiversity that these habitats support; for example small waters such as ponds, headwaters, ditch systems, small lakes, and groundwater dependent terrestrial ecosystems such as springs, fens and other wetlands, that fall outside of the size thresholds for designation as Water

Framework Directive water bodies all require action to improve their status that is not well promoted through the existing River Basin Management Planning framework.

Water can only be managed sustainably if all water-users work together: all public bodies, local communities, businesses, and land and water managers. Of particular importance will be the environmental ambitions for Scottish Water, and the transformation of the agricultural sector as it moves towards a more climate and nature-smart future. Climate change is recognised as a major driver of change in nature, globally. Freshwater habitats and species are particularly at risk, because of profound effects of the prevailing conditions of the water environment on interrelationships between ecosystem functioning and prevailing conditions. The impacts of climate change on freshwaters are likely to include increased air and water temperatures and an increased extent and frequency of flooding and droughts.

The next Scottish Government should prioritise:

- **Limit development on floodplains.** Giving more space for rivers and coasts to move and adjust naturally will regenerate habitats, improve conditions for wildlife and help us adapt to climate change. Spatial planning must prevent development on floodplains to mitigate flood risks and support riparian and wetland habitats. High proportions of rivers are disconnected from their floodplain by embankments and flow control structures, limiting the scope of those floodplains to hold water during high flows and contributing to downstream flooding issues. This loss of connectivity must be reversed. Existing work to identify and remove unnecessary/defunct structures, and enforcement to deal with unconsented works, must continue with a preference given to schemes which utilise nature-based solutions/natural flood management wherever possible.
- **Support agricultural practices that enhance freshwater environments.** New agricultural techniques will be necessary to support our adaptation to the effects of climate change. Adopting measures such as crop rotation will help to restore the functionality of some floodplains. Other policies must be in place to support farmers to convert some farmed land on floodplains back into natural habitat and protecting ponds on agricultural land.
- **Maintain membership of REACH.** A robust and strategic approach to tackling chemicals in the freshwater and nearshore environment is urgently required. Scotland, and the UK as a whole, should stay in REACH, which will prove to be much more cost-effective and prevent any unnecessary work, time and money being spent on system duplication. Only by linking elements of the Water Framework Directive with a regulatory control of substances of very high concern can the intended protection of water bodies/aquatic ecosystems be achieved.

Scottish Environment LINK is the forum for Scotland's voluntary environment community, with 40 member bodies representing a broad spectrum of environmental interests with the common goal of contributing to a more environmentally sustainable society.

This manifesto has been produced by input from LINK working groups, to which a variety of members contribute to. This manifesto is supported by the following LINK member organisations:

Amphibian and Reptile Conservation
Association for the Protection of Rural Scotland
Bat Conservation Trust
Buglife Scotland
Bumblebee Conservation Trust
Butterfly Conservation Scotland
Environmental Rights Centre for Scotland
Fidra
Friends of the Earth
Froglife
Hebridean Whale and Dolphin Trust
John Muir Trust
Keep Scotland Beautiful
Marine Conservation Society
North East Mountain Trust
Planning Democracy
Plantlife Scotland
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RSPB Scotland
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Scottish Badgers
Scottish Campaign for National Parks
Scottish Countryside Rangers' Association
Scottish Wild Land Group
Scottish Wildlife Trust
Soil Association Scotland
Trees for Life
Woodland Trust Scotland
WWF Scotland

For more information contact:

Vhairi Tollan
LINK Advocacy Manager
vhairi@scotlink.org
07512 828 004

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Registered Headquarters: 13 Marshall Place, Perth, PH2 8AH
Advocacy Office: Dolphin House, 4 Hunter Square, Edinburgh, EH1 1QW