



## **SUMMARY**

- Now, more than ever, Scotland needs to get the very best out of its land across the full range of ecosystem services that it provides. This will require far-reaching changes in land use across the country's many diverse landscapes and land management systems.
- Bringing about these changes should be the overarching objective of all relevant public policies. The Land Use Strategy should specify the desired destination and set the course for reaching it, providing the strategic guidance essential for the Regional Land Use Frameworks that should spell out the detail.
- The climate and nature emergencies, and the challenges posed by Brexit, mean that this direction is urgently needed. It also represents a great opportunity to map out a truly sustainable future for land use in Scotland.
- The present draft falls well short of this ambitious aim. Whilst it usefully identifies the many policy areas relevant to achieving it, it does not provide the vision or the dynamism to ensure that they all contribute to the coherent and coordinated effort necessary for success.
- LINK members have a range of constructive suggestions to create a Land Use Strategy which would deliver the significant land use change that the current climate and nature emergencies require, and we would be keen to engage with the government to discuss our comments.

## **Introduction**

Faced with the triple challenges of the climate emergency, the biodiversity crisis and Brexit, Scotland needs to get the very best out of its land, across the full range of ecosystem services that it can and must supply. Pursuing this goal and driving the land use changes required to attain it has been from the outset the aim of the Land Use Strategy. In present circumstances it is more imperative than ever that it is effective in achieving it. It is against that demanding specification that LINK bodies have assessed the current draft of the third Strategy. They are more than willing to work with officials to try to help remedy some of the deficiencies that they have identified.

## **The Land Use Strategy is important...**

Scotland has little under a decade to meet its ambitious 2030 climate target. At the same time 1 in 9 species in Scotland is at risk of extinction, mirroring steep declines in biodiversity worldwide. If we are to tackle this nature and climate emergency, we must make large scale and rapid changes in the way we use and manage our land (as the government itself acknowledges in the recent Climate Change Plan Update). Such large scale and rapid changes in land use and management need to be approached strategically rather than allowed to happen in a disorganised way. This is why the third Land Use Strategy is so critically important as the key tool available to the Scottish Government to set the necessary course and drive its implementation.

## **...but the Scottish Government has so far failed to make the most of this key tool...**

The government has had to produce and regularly update a Land Use Strategy (LUS) since Climate Change (Scotland) Act introduced the requirement in 2009. The first LUS set out some admirable principles but since then the government has, in our members' view, failed to grasp the concept's full potential and to use it effectively as a mechanism to help harmonise policy related to land. In particular, it has as we see it been regarded too much as a mechanism of relevance only to the environmental agenda, not to the wider responsibilities of government. Treated as such, it has not gained the traction that it was intended to exert across a broad swathe of public policies. We acknowledge that the government more recently made a welcome commitment to develop Regional Land Use Partnerships and Frameworks but this makes a commensurate commitment to a substantive LUS all the more vital: the whole purpose of these structures is to bring together national and local ambitions and priorities, necessitating a coherent strategic steer from the LUS.

**...and there is a danger that the Third Land Use Strategy could be another missed opportunity...**

We have a range of comments on structure and content, but we would like to start by emphasising that the draft document contains some statements that we wholeheartedly applaud. We welcome the government's clear statement that the climate and nature crises are intrinsically linked and that both crises arise from stretching the Earth's systems beyond their sustainable limits. We also welcome the clear acknowledgement that "the way in which we manage and use our land needs to change radically if we are to deliver our climate and environment goals and achieve positive outcomes for ourselves and the natural systems on which our way of life depend." This acknowledgment of the need for radical change is good to see as it suggests that the government understands that maintaining the status quo will not address the climate and nature emergency.

This said, our members have some serious reservations about the draft strategy as a whole, namely that:

1. The draft as it stands is not really a strategy at all. It lacks any analysis of the relevance and significance of land use to the challenges we face, of the current sustainability of land use or of what needs to change to make it more sustainable. In consequence the reader is left without any real conception of why land use matters, what needs to change, what direction the government intends to take and how they intend to bring about change.
2. Tackling the climate and nature emergency will oblige us to make difficult choices relating to land. We need to think about the ways that land use will have to change, the consequences of that change and how we manage the process of change. These challenges need to be brought to life in this document if it is really to focus minds and to provide the steer that our whole society, and land managers in particular, requires.
3. We welcome in principle the proposal to follow up the LUS itself with a more detailed delivery plan. But without spelling out more clearly in it the outcomes that are desired, the LUS can hardly constitute an adequate basis for such a plan.
4. The collation, in the landscape sections of the document, of government policies, funding and initiatives that are relevant to land use is useful as a source of information. But what it does not do is indicate clearly an overall direction of travel that these do or, more importantly, should support. We note that the draft states explicitly that it is not its purpose to bring forward new policy. But the reader is not given any insight into the degree to which current policies help to move land use in the direction required if the broad objectives and principles of the LUS are to be attained.

5. As it is currently written, the emphasis seems to be on using the third LUS as a communication tool to reach new audiences. Our members acknowledge that it is important to communicate government policy, but they question whether the Land Use Strategy itself is the correct vehicle for that communication activity. The draft strategy currently reads more like a leaflet that would accompany the Strategy itself rather than a serious strategic document that should have a pivotal role in government.
6. Our members can see what the government is trying to do by structuring a document around 'landscapes'. If the government wants to reach a wider audience and communicate the importance of land use, then referring to landscapes that may have meaning for people could be a way of making that discussion less abstract. As it stands, however, our members do not believe that it works, for two main reasons:
  - a. The lack of context and strategy at the start of the document means that the landscapes do not really make sense. Our members believe it is important that the document includes a clear strategic direction at a national level. This does not seem possible through the landscape approach adopted in the draft and so we would encourage the government to include additional material that applies to the whole country. If the government is wedded to the landscapes approach, it could be added afterwards for illustrative purposes.
  - b. The actual 'landscapes' are confusing. The current categories beg questions about the categories rather than helping shed light on the landscape itself. There are, for example, substantial grey areas/overlaps between several categories such as semi-natural land, marginal land and uplands.
7. The initial focus on embedding the ecosystems approach that was so important at the time that the first LUS was launched seems to have been completely lost from government thinking. Yet the concept is absolutely fundamental to a proper analysis and understanding both of sustainability and of the climate and biodiversity emergencies. We urge the Scottish Government to embrace and deploy it once again.
8. The overarching vision is too woolly and ducks the fundamental choices that we now face. It needs to be re-worked. The vision now must be making land use sustainable, which current land use is not. If it was, we would not be facing a nature and climate emergency to the extent that we are and there would not be an ever more widespread recognition across society that things need to change. It is important that the LUS has a clear vision and that this is firmly grounded in the necessity of tackling the climate and nature emergency.
9. The objectives also need to be re-worked. Our members believe that the objectives need to be more focused on enhancing biodiversity, increasing carbon sequestration in soils, reducing emissions from existing land uses including agriculture, and developing a spatially strategic approach so that land use change is managed in a way that maximises the benefits and minimises the negatives.

**Scottish Environment LINK is the forum for Scotland's voluntary environment community, with over 35 member bodies representing a broad spectrum of environmental interests with the common goal of contributing to a more environmentally sustainable society.**

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