LINK Consultation Response

Scotland's Fourth Land Use Strategy October 2025



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Introduction to Scottish Environment LINK

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

Its member bodies represent a wide community of environmental interest, sharing the common goal of contributing to a more sustainable society. LINK provides a forum for these organisations, enabling informed debate, assisting co-operation within the voluntary sector, and acting as a strong voice for the environment. Acting at local, national and international levels, LINK aims to ensure that the environmental community participates in the development of policy and legislation affecting Scotland.

LINK works mainly through groups of members working together on topics of mutual interest, exploring the issues and developing advocacy to promote sustainable development, respecting environmental limits. This consultation response was written by LINK's Land Use and Land Reform Group.

Questionnaire

Question 1

Do you find Map Figure 1 to be a helpful representation of current land cover?
☐ Yes ☐ No

Question 2

How can we most effectively represent housing and renewable energy alongside current land cover maps?

The map of current land use based upon raw land cover data provides a rudimentary overview of current land use categories. The extent to which it acts as a helpful representation of current land cover depends on how it is intended to be used and in which contexts.

The Land Use Framework for England consultation's (referred to in this consultation paper) similarly takes a spatial approach yet mapped the potential of land to support different land uses and corresponding outcomes to examine what the land use transition could mean geographically. The Land Use Framework for England consultation's Analytical Annex offered multiple national maps to better consider the potential for different land uses alongside landscape types, including maps showing the



relative potential for peat restoration, coastal and heathland habitat restoration, coniferous and broadleaved tree growth, alongside current food production.

The single map offered in this strategy consultation paper, however, provides only a basic overview of current land (use) categorisations without any sense of potential future variations that would befit a strategy. This map does not provide any information about the intactness of these landscapes, nor how these are affecting Scotland's greenhouse gas emissions. The superimposition of potential land use options to support the movement to sustainable land use (as mapped in the Land Use Framework for England consultation) onto existing layers would be more useful for stakeholders in future when developing Regional Land Use Frameworks.

With regards to the representation of housing and renewable developments, there are already many other maps in existence that will be useful in the process of integrated land use planning. Some direction may be taken from multiple existing layers in Scotland's environment maps, the Peatland ACTION data portal, the upcoming Natural Capital Tool, or the Renewable Energy Planning Database.

Question 3

What sort of information about current land use would you find useful? (and how would you use it?).

As described in response to Question 2, future land use scenarios based upon suitability and potential would be helpful for stakeholders at national, regional and local scales.

Vulnerability mapping of climate conditions must also be factored into future projections to inform spatial climate adaptation options for decision-makers and stakeholders at multiple scales; for example, priority peatland restoration areas that will be more resilient to the effects of climate change.

Question 4

Do you agree that these are the key areas that need to be delivered by Scotland's lar	ıd?
Yes No No	

Question 5

Are there any important land uses that you feel are missing or underrepresented in this list?

The key areas included in the consultation paper mark some of the basic aspects of land use that clearly must be considered in integrated land use planning. Other key areas should include the Scottish National Adaptation Plan, Scottish Outdoor Access Code, National Marine Plan (with respect to coastal areas), Pollinator Strategy and the River Basin Management Plan for Scotland 2021-2027. Consideration of nature-based solutions (e.g. that alleviate risk from wildfires, flooding, or landslides) and where they could be most effective, would support their planning and implementation.



However, LINK members believe that previous iterations of the Land Use Strategy have failed to grasp the full potential of a Land Use Strategy as a mechanism to help harmonise government policy. The fourth Land Use Strategy's key areas should similarly extend beyond those restricted to the environmental sector and bridge some of the wider responsibilities of government, for example, National Planning Framework 4, Scottish Energy Strategy and the National Transport Strategy.

Question 6

How do you think data and mapping can evolve to better support our understanding of future land use and national ambitions—including the impacts, benefits, opportunities and trade-offs of change?

As mentioned in response to Question 3, the Land Use Framework for England consultation Analytical Annex included maps showing the relative potential for peat restoration, coastal and heathland habitat restoration, coniferous and broadleaved tree growth, alongside current food production. This is a helpful illustration in mapping out not only current land uses, but the potential for transitions towards more sustainable land use. Scottish Forestry's Native Woodlands Targets Map is a step in the right direction for mapping future land use ambitions, yet these spatialised targets and ambitions must be available in all sectors pertaining to competing land use interests so that these can be strategically considered against one another by stakeholders.

As Regional Land Use Partnerships and Frameworks continue to develop, these will significantly benefit from higher resolution and relative potential mapping to support decision-making at a local scale, as noted by the South of Scotland RLUF. Similarly, land use planning must be considered in tandem with other spatialised regional governance plans, including Regional Spatial Strategies (as recommended by the Scottish Land Commission in 2020) and emerging Regional Adaptation Plans.

This data-collection and mapping must also take into account climate change in integrated land use planning. As we raised in response to Question 3, vulnerability mapping of climate conditions must be factored into future projections to inform spatial climate adaptation options for decision-makers and stakeholders at multiple scales; for example, priority peatland restoration areas that will be more resilient to the effects of climate change. Similarly, aforementioned relative potential maps should evolve with the conditions of a changing climate.

Question 7

What tools	data d	or approaches	would h	neln improve	this und	lerstanding	over time?
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Please see the answer to Question 6.

Question 8

Do you think the description provided captures what is meant by 'integr	ated landscapes'?
Yes No	



Question 9

Do you agree that	t integrated landscapes are the most effective approach to addressing Scotl	and's land
use ambitions?		
☐ No		

Please give reasons for your answer.

We agree that taking an integrated approach to strategic land use planning is key to meeting national climate change and biodiversity targets; however, 'integration' also refers to the planning and management of land use and how these align with national targets and strategy, not necessarily the inherent qualities of the landscapes themselves.

Scottish Environment LINK members believe that RLUPs in particular can play a significant role in delivering integrated land use that is effective, locally sensitive and ecologically coherent. In simple terms, we envisage land use planning as follows:

- National targets and strategy are set by the Scottish Government;
- RLUPs outline how these national goals relate to existing and potential land use at a regional level, identifying regional priorities and opportunities for investment;
- Frameworks developed at regional level then influence the distribution of public funding and, through opportunity mapping, act as a prospectus for philanthropic or responsible private investment.

At present, public funding related to land use is generally distributed through national schemes or competitive funding pots. This approach does not necessarily encourage landscape-scale cooperation or targeted investment in a way that will build ecological connectivity at scale. RLUPs could improve this situation by identifying key habitat networks or other areas of opportunity for collaborating stakeholders.

For this collaboration to be most effective, however, RLUPs should have the ability to inform the distribution of public funding streams (including conditional agricultural payments, forestry grants, NRF and other funds). This could be achieved by ensuring that funding applications receive additional points or are fast-tracked where they are aligned with the agreed outcomes in their respective Regional Land Use Frameworks (RLUF). Significant proportions of enhanced conditionality funding within new rural support (Tiers 2 and 3) could also be earmarked specifically for collaborative schemes with outcomes that support RLUF outcomes.

RLUPs could also play an important role in pulling together large-scale projects that do not fit squarely into other public funding streams, but which could be suitable for capital investment from the Scottish National Investment Bank.

Through opportunity mapping, RLUPs can also help realise the Scottish Government's vision of high-integrity, values-led private investment into Scotland's nature. These partnerships can identify hotspots where projects could have cross-cutting impacts f or carbon sequestration and nature restoration, as well as helping to achieve the scale of projects required by some larger institutional investors.



They are also important in delivering a just transition as they capture the key priorities of local communities regarding what would improve their quality of life or the local economy, including improving local natural capital assets. These are the most important underlying conditions which determine the feasibility and success of natural capital projects.

Working with Landscape Enterprise Networks, for example, RLUPs could play roles as coordinators and bring together stakeholders to co-design packages of measures that deliver for the environment, communities, landowners and investors.

The Scottish Government must build on the pilot RLUPs to capitalise on the considerable opportunities offered by this approach for integrated land use planning.

Question 10

Have we identified the right factors influencing land use integration?
☐ Yes ☑ No

Question 11

Which of these factors do you feel are the most influential?

Clearly, all of these listed factors are important, but they are all expressed in very general terms and will play more prominent roles in different situated contexts.

However, a key factor that is not considered in this thematic overview, yet which particularly affects the success of integrated land use planning is both the perceived and real degree of government support for a strategic approach to integrated land use planning, particularly at a regional scale. This factor has been highlighted by the Scottish Land Commission (2020) and has been discussed in depth by Peskett et al. (2023).

The success of integrated land use planning is heavily dependent on perceptions of government support and the availability of coherent guidance. However, there is little political power allocated for existing integrated land use planning stakeholder groups and plans (RLUPs and RLUFs), lacking specific public funding streams for established Frameworks, and poor understanding of where integrated land use planning sits within government priorities. Similarly, whilst RLUPs were in development, there were low levels of short-term funding and lacking resourcing for these partnerships, lacking government objectives for existing RLUFs, which together reduce the public perception of integrated land use planning being a real priority for government, offering little incentive for participating stakeholders.

Cumulatively, as Peskett et al. (2023) have raised, these factors can lead to perceptions of the Land Use Strategy being a tokenistic exercise in meeting the statutory requirements of the Climate Change Act 2009, which reduces the viability of integrated land use planning beyond the factors listed in this consultation document.



See: Peskett, L., Metzger, M. J., Blackstock, K. (2023) 'Regional scale integrated land use planning to meet multiple objectives: Good in theory but challenging in practice', Environmental Science and Policy, Vol. 147, pp. 292-304. https://doi.org/10.1016/j.envsci.2023.06.022

Question 12
Are there any important factors we have missed?
Please see the response to Question 11.
Question 13
Would the inclusion of case studies help to illustrate the practical delivery of integrated land use?
Yes No No
Question 14
Would the inclusion of information on ecosystem services and opportunities for increased benefits help to illustrate the wider value of integrated landscapes?
Yes No No
Question 15
Do you agree that the role of LUS4 should be to influence policy makers and regulators in order to create an enabling environment that incentivises and/or supports land managers, communities and partnerships to further integrate land use/management?
Yes No No

Question 16

Are there other ways in which LUS4 could support alignment and integration?

We welcome the redirection of the vision of the Land Use Strategy towards making land use sustainable to tackle the nature and climate emergencies. Given its origin from within the Climate Change Act 2009, the Land Use Strategy was always intended to support Scotland's transition to net zero (and, more recently, nature-positive) and we welcome that these are finally reflected in its vision, along with the prioritisation of nature and climate within its thematic objectives.



We are also supportive in principle of the proposal to follow up the LUS with a portfolio of actions that align with the identified themes and objectives. However, without these actions, this consultation paper does not constitute an adequate basis for strategically mapping how the government intends to bring about tangible change.

Like previous iterations, this consultation paper lacks any analysis of the significance of land use to greenhouse gas emissions and biodiversity loss, of the current social and ecological sustainability of land use or of what strategically needs to change to make it more sustainable. In consequence, there is no real conception of how the government intends to bring about change nor what in practice is meant by 'creating an enabling environment' for integrated land use planning?

Tackling the climate and nature emergencies will oblige us to make difficult choices relating to land. We therefore need to realistically 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 clearly outlined in this document if it is to focus minds of both policymakers and regulators, and to provide the necessary steer that this context requires.

The role of LUS4 should therefore be to provide a tangible strategy of how Scotland will ensure that its land use meets the challenges of the nature and climate emergencies and how this should influence decision-making at national, regional and community scales. In this form, there is little sense of how this will be delivered at any level beyond signposting to pre-existing strategies.

Where the third Land Use Strategy made initial promising steps towards integrating needs and negotiating the challenges of regional land use planning through Regional Land Use Partnerships, these tangible steps are absent from this document. Accordingly, the new vision and new objectives must build on the pilot RLUPs to capitalise on the considerable opportunities offered by this approach for integrated land use planning. Without meaningful spaces for democratic deliberation with appropriate resourcing and enforcement, the new objectives risk failing to deliver the land use changes that are urgently needed.

Finally, reference is made to the National Marine Plan, but the strategy needs to better integrate consideration of the interface between the sea and the land, including managed realignment and nature-based coast protection.

Question 17

Do you agree with the proposed approach to developing a new vision and integrated set of objective for the Land Use Strategy?
∑ Yes ☐ No ☐

Scottish Environment LINK members agree that the new vision and objectives more actively situate climate and nature as the priorities in driving land use change; however, members are also concerned that focus should remain on delivery. If these objectives are to be revised, then these should be expressed in SMART terms (Specific, Measurable, Achievable, Relevant and Time-Bound).



Question 18

If yes, please highlight them

Which approach would you prefer for LUS4?
Removal of the land use principles Establishment of a refreshed set of principles (if this is your preference, please tell us what you think they should cover and how you envision their application)
LINK members suggest that focus should be made towards delivery and tangible action in land use transformation and that revising a set of principles may detract from this. Having said this, if this strategy is for the benefit of influencing policymakers and regulators, then this refreshed set of principles must reflect this new audience.
Question 19
To what extent do you agree that the draft indicators provide a strong basis for measuring progress toward improved outcomes under the Nature and Climate theme?
 Strongly Agree Agree Disagree Strongly Disagree Unsure
If you selected "Disagree" or "Unsure", please tell us why
Firstly, with regards to the indicators themselves, LINK members would seek to qualify woodland creation to native woodland creation and natural colonisation and regeneration. Members would also suggest indicators covering invasive non-native species (INNS) control and habitat connectivity through nature networks included in these indicators.
However, on a second broader point, LINK members feel that it is challenging to define indicators from these objectives, as the framing of these objectives are too general. These should be expressed in SMART terms (Specific, Measurable, Achievable, Relevant and Time-Bound) and have clearly articulated outcomes. If 'integrated land use' is the primary aim of this strategy, more thought must be given as to how integration can be measured beyond aggregated outputs than, for example, greenhouse gas emissions and hectares of woodland.
Question 20
Are you aware of other data sources that could be used to monitor progress towards these outcomes?
☐ Yes ☐ No



N/A

Question 21

toward improved outcomes under the Jobs, Skills and Economy theme?
Strongly Agree Agree Disagree Strongly Disagree Unsure
If you selected "Disagree" or "Unsure", please tell us why.
N/A
Question 22
Are you aware of other data sources that could be used to monitor progress towards these outcomes ?
☐ Yes ☐ No
If yes, please highlight them
N/A
Question 23
To what extent do you agree that the draft indicators provide a strong basis for measuring progress toward improved outcomes under the Community, Places, People and Equity theme?
☐ Agree☐ Disagree☐ Strongly Disagree☐ Unsure
If you selected "Disagree" or "Unsure", please tell us why.
N/A



Question 24

these outcomes?
☐ Yes ☐ No
If yes, please highlight them
N/A

Question 25

Are you aware of any ways in which the proposed vision and objectives need to consider the different experiences, both positive and negative, current or future, of the following groups?

- island communities
- young people, (children, pupils, and young adults up to the age of 26)
- those with protected characteristics (age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation); and/or
- groups or areas at socio-economic disadvantage (such as income, low wealth or area deprivation)?

N/A

Question 26

Are you aware of any potential costs and burdens that you think may arise as a result of the vision and objectives within this consultation? If so please give details?

As LINK members have suggested in this response, the new vision and new objectives must build on the pilot RLUPs to capitalise on the considerable opportunities offered by this approach for integrated land use planning.

In order to meaningfully deliver integrated land use, these regional partnerships and their frameworks will require appropriate funding. A lack of funding, resources and short budgetary timescales were highlighted as challenges facing the success of Regional Land Use Partnerships. This was also a key barrier identified in earlier LUS pilots. Additional long-term costs must be factored into the integration of land use.

This funding will both support the delivery of integrated land use and also importantly demonstrate that changing land use is a priority in government efforts to meet climate and nature targets. As we described in our response to Question 11, this real and perceived government support is a critical factor in influencing land use change.



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