

Response ID ANON-2SNG-88XR-M

Submitted to **Getting the best from our land, consultation on a draft Land Use Strategy for Scotland 2016 - 2021**

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Information about you

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Publish this response

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

Yes

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

Local community, Forestry

other:

Vision, Objectives and Principles

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

Don't know

1b Please provide your reasons for your answer.

1b:

In general we support the Vision, Principles and Objectives but they are rather blandly presented and do not sufficiently emphasise the need for change, nor do they reference the achievement of sustainable development – this is explicitly referenced in the “Duty to produce a land use strategy” in the 2009 Act, but

otherwise only mentioned twice in the LUS consultation document, in both cases in references to “the sustainable development of communities”.

We are very concerned at the assertion that the CAP reform process is complete: on the contrary there is a great deal to do to reform CAP payments (Pillar 1 in particular) to ensure they support rather than inhibit the Land use Strategy and other Scottish Government policies.

Natural Resource Management

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

Don't know

2b Please provide reasons for your answer.

2b:

The ecosystems approach has some interesting characteristics and may prove to be effective management tool, but we see little evidence that it is being used effectively, or even at all, to manage Scotland's natural capital.

The land use pilot projects referred to were intended to explore the creation of a spatially based framework that would aid land use change decision making, rather than to directly influence land use decisions. Such frameworks may well have value but the utility of those generated by the regional pilots was severely constrained by the deliberate refusal to take account of the impact of the current and historic fiscal regimes (e.g. subsidies, grants, tax rebates and exemptions) pertaining to land use.

Policy Alignment

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

Don't know

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

3b:

The policies may be neatly tabulated but their content is often conflicting, notably fiscal policy with respect to land ownership and management which often works to thwart rather than achieve sustainable development.

Planning

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

Not Answered

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

4b:

Forestry

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

5:

We welcome the commitment to review the Scottish Forestry Strategy.

The 2006 SFS identified 4 principles

- Sustainable development – underpinned by sustainable forest management.
- Social inclusion - through helping to provide opportunities for all, and helping to build stronger communities.
- Forestry for and with people.
- Integration with other land uses and businesses.

We consider that these remain valid, but believe that in future their implementation should be more balanced and less focussed on delivering a narrow interpretation of “sustainable forest management”.

The 2006 Strategy provided a comprehensive (at that time) overview of forestry objectives, but contained little in the way of targeting or prioritisation and there was no indication of any mechanism to mediate between conflicting objectives. The reviewed Strategy should be much clearer about the desired balance of the various outcomes, and about the mechanisms to deliver this balance.

Thematically, the 2006 Strategy covered the main policy areas, however, most if not all themes will need refreshing to reflect policy developments, e.g. the Community Development theme will need updating to reflect the Community Empowerment and Land Reform agendas.

Tackling climate change will inevitably be a leading theme in the refreshed SFS: we welcome this but believe it important that the Strategy endorses a holistic approach to climate change mitigation incorporating better management and utilisation, rather than a narrow focus on woodland creation for carbon sequestration.

Land Reform

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

Yes

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

6b:

We agree that there would be advantages in having a single policy statement about land dealing with ownership, use and management, which would help illuminate the relationship between land ownership and land use. It is important that such a single policy statement does not water down the Scottish Government's intent to ensure there is a more proactive approach to land governance in Scotland.

Sectoral policies such as the Scottish Forestry Strategy derived from the Land Use Strategy should incorporate land reform objectives. We note that the recent discussion document "The Future of Scottish Agriculture" did not reference Land reform, community empowerment or the Scottish Government's own target of one million acres in community ownership by 2020 - a single policy statement would help address such deficiencies in future.

Ecosystem Services Mapping and Tools

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

Yes

7b Please provide your reasons for your answer.

7b:

We support all moves for greater transparency in land ownership and management, and believe that publicly available (e.g. online) GIS tools showing beneficial ownership and public subsidy and grant support for land ownership and management would inform decision making about land use/management change.

We have some concerns about the over-reliance on GIS-generated models for land-use planning and regulation; our experience is that the data used is often of variable quality (inaccurate, out-of-date, and/or being used inappropriately), but that there is a tendency to regard the output maps as gospel truth.

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

Yes

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

7d:

See comments made in response to Q7b above.

Regional Land Use Partnerships

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

Don't know

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

8b:

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

8c:

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

8d:

We are unclear as to the value of such partnerships and what real benefits they are expected to deliver. We agree that there is merit in bringing stakeholders together and developing frameworks for decision making but only if they result in land use changes and better management. There is a real risk that they will become another tier of agency talking shop.

Regional Land Use Frameworks

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

Don't know

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

9b:

The evaluation of the regional pilots illustrated a number of issues to be resolved. Perhaps the two most significant are finding the most appropriate scale(s) for such frameworks to operate at and demonstrating that the benefits arising justify the very significant expenditure and effort required.

9c Do you have any comments on this proposal?

9c:

Land Use Mediation and Facilitation

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

Yes

10b Please provide reasons for your answer.

10b:

We believe that land use mediation or facilitation could be useful, although care will be required to ensure that such services operate effectively.

Agriculture

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

11:

All grants and subsidies for agriculture (and other land uses), including Direct Payments, should be contingent on delivering genuine climate friendly farming (and land use), not just the watered down "greening" criteria in the current CAP.

The rebate for agricultural diesel should be phased out: if land management needs ongoing public subsidy then this should be delivered via mechanisms that reinforce policies to limit emissions, not by encouraging fossil fuel use.

Agri-Environment

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

Don't know

12b Please provide your reasons for your answer.

12b:

In principle this seems an attractive approach however we are unconvinced that the GIS data available is of adequate quality and/or resolution to do this fairly and effectively.

Agri-Environment

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

Don't know

13b Please provide your reasons for your answer.

13b:

Again, we are concerned that this will lead to over-reliance on data of variable quality.

Urban Land Use

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

Yes

14b Please provide your reasons for your answer.

14b:

Monitoring Delivery of the Strategy - the Land Use Strategy Indicators

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

No

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

16b:

The indicators should be revised once the Strategy is finalised: some may still be fit for purposes but others will be required to reflect the development of the Strategy and the incorporation of Land reform objectives.

General Questions

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

17:

18 Are there any other points you wish to make about any aspect of this draft Strategy?

18:

The key to the effectiveness of the Land Use Strategy is the degree of alignment of the fiscal regime (e.g. subsidies, grants, tax rebates and exemptions) pertaining to land use - currently this is very low.

The fiscal regime (not just SRDP) should be focussed on delivering public benefits, in particular on training and skills, environmental enhancement and community development.