

CWA response to consultation on Third Land Use Strategy

Vision

“A Scotland where we fully recognise, understand and value the importance of our land resources, and where our plans and decisions about land use will deliver improved and enduring benefits, enhancing the wellbeing of our nation.”

Q1: Do you think that this vision still reflects the outcomes we need to achieve?

- A) Yes
- B) No**
- C) I don't know
- D) I do not have enough information

Q2: If not, what key changes would you like to see for a new Land Use vision?

The current vision is bland, vague and lacks meaningful aspiration or commitment to better land use. In this it mirrors the Strategy itself which, whilst focussing on the many positive actions being taken by the Scottish Government, fails to address or even define the fundamental challenges and issues that a Land Use Strategy might be expected to tackle.

We note that Section 57 of the 2009 Climate Change Act provides that, *inter alia*, the Land Use Strategy must set out Scottish Ministers' objectives in relation to sustainable land use, their proposals and policies for meeting those objectives and the timescales over which those proposals and policies are expected to take effect; and that these objectives, proposals and policies must contribute to sustainable development – it is unclear that this remit is being met by the draft third strategy as presented.

The vision, like the Strategy itself, appears to be in denial that land use, or any aspect of the Scottish Government's policy, need to change at all: merely suggesting that an undefined “we” needs a better understanding of the importance of land resources, and that plans and decisions about land use will themselves be sufficient to deliver similarly undefined benefits.

We suggest something along the lines of:

“A Scotland where land use, policy and support mechanisms have been fully aligned to address climate, biodiversity and social justice challenges and deliver wellbeing, economic success, environmental sustainability and land reform for the benefit of our nation.”

Q3. Do you think any of the above objectives need updating? If so, please indicate which you think needs changes. You can tick all that apply.

- A) I think they are good as they are, no changes needed
- B) “Land based businesses working with nature to contribute more to Scotland's prosperity” should be changed** Comments:
- C) “Responsible stewardship of Scotland's natural resources delivering more benefits to Scotland's people” should be changed**

D) “Urban and rural communities better connected to the land, with more people enjoying the land and positively influencing land use” should be changed

Q4. If you consider that one or more objectives need updating, please explain what changes you would like to see in the objective(s). Please make sure you state clearly which objective each suggestion relates to.

As with the vision, the three objectives are bland and vague. Whilst it’s difficult to construct SMART objectives for such wide-ranging circumstances it should be possible to focus them more clearly.

The first objective should reflect the need for more sustainable land use underpinning economic activity.

The second objective should specifically reference the need to reduce GHG emissions and to tackle the biodiversity emergency.

The third objective should specifically reference the Scottish Government’s land reform agenda.

Q5: Before reading this document were you aware of the pressures on our land?

A) Strongly aware of all pressures on our land

B) Aware of many of the pressures on our land

C) Knew land was needed for some things

D) Not aware of the extent we need our land

E) Completely unaware of the importance of our land

Q6: Are you aware of ways people can get involved in land use matters within your local area?

A) Yes

B) No

Q7: Do you think the landscapes are an effective way to communicate Scottish Government policy?

A) Yes

B) No

C) I don’t know

D) I do not have enough information

Comments

CWA supports the intention to improve the accessibility and relevance of the third Land Use Strategy to as wide a range of stakeholders as possible and in this respect structuring the new Strategy around a series of conceptual landscapes may well be an effective way to do this.

However we are concerned that this structure may inadvertently give the impression that cross-cutting policies are focussed on or constrained to particular landscapes. For example, discussion of the Community Empowerment Act is contained in the Islands section, the Scottish Land Fund (which is open to urban and rural communities) is mentioned in the Uplands section, whereas community woodland ownership and the very welcome support for CWA is listed as an Urban policy objective when it is equally relevant to rural communities.

Q8: Under each landscape we have identified three sub headings: Climate Change, Biodiversity and Communities. Do you think that these capture the crosscutting themes that are important to all of Scotland?

- A) Yes
- B) No
- C) I don't know
- D) I do not have enough information

Comments

We agree with the three cross-cutting themes that have been identified, however, as discussed in our response to Q9 below, the scope of each, and the challenges that must be addressed under each theme, are not adequately recognised.

Q9: Does the content of the Land Use Strategy and the manner in which it has been presented, demonstrate that the Scottish Government is taking steps to help deliver sustainable land use?

- A) Yes
- B) No
- C) I don't know
- D) I do not have enough information

Comments

The draft Land Use Strategy does demonstrate that the Scottish Government has a wide range of welcome policies and proposals to enhance aspects of land use. However, as noted in our response to Q2, the scope of the strategy is very narrowly drawn and focussed

primarily on defending the status quo, particularly with respect to agriculture, rather than addressing the need for substantive change to deliver desired objectives in a range of areas from climate change to land reform.

With respect to climate change, there is an immediate need for measures to significantly reduce GHG emissions from agriculture: these represent a considerable contribution to Scotland's total GHG budget but this is glossed over in the draft strategy. It should also be recognised that wider societal change to tackle climate change (e.g. reduced consumer demand for meat, especially beef and lamb, or measures to reduce travel) may impact on land-based businesses – this is not reflected in the discussion of e.g. agriculture and tourism.

Whilst the draft strategy does reference community ownership and the Scottish Land Fund, there is no explicit mention of land reform. As Paul Wheelhouse MSP's foreword to the LRRG's 2014 report states: *"The relationship between the land and the people of Scotland is fundamental to the wellbeing, economic success, environmental sustainability and social justice of Scotland and her communities. The structure and system of land ownership is a defining factor in that relationship: it can facilitate and promote development, but it can also hinder it"*.

Housing is mentioned several times in the draft strategy, but there is very little by way of policy or proposals to address Scotland's housing crisis. For many of our member groups the lack of affordable housing is the most pressing issue in their communities, not only in terms of retaining population but also in that it inhibits economic development: there is little point creating new jobs in remote rural communities if there is no housing available for new employees.

Likewise, there is no reference to the urgent need for reform of the fiscal regime applying to land: the current suite of tax exemptions inhibits rather than supports the delivery of sustainable development. Similarly the exit from the EU demands the development of a new system of grants; it is critical that the new regime focuses on the delivery of public benefits rather than perpetuating historic entitlements. As a matter of principle, public funding for land management should be targeted, transparent, accessible to all, reward management rather than ownership, provide value for money, and be consistent across land uses.