

RURAL AFFAIRS AND ENVIRONMENT COMMITTEE
SCOTTISH GOVERNMENT'S DRAFT LAND USE STRATEGY
WRITTEN SUBMISSION FROM SE LINK

Summary

LINK believes that the Scottish Government's draft Land Use Strategy:

- presents direction and aspiration but is not a strategy with clear goals and action;
- is weak and unambitious, and fails to set out proposals and policies to meet Governments' *sustainable* land use objectives, as required by the Climate Change (Scotland) Act 2009;
- needs a more definitive statement on how it should be incorporated into governance structures and influence other existing land use strategies;
- is limited in scope, particularly with regard to urban land use, recreation and access;
- lacks clarity regarding how it will be developed and monitored; and
- in its current form, is unlikely to move Scotland towards more sustainable use of land resources and the optimal delivery of multiple benefits.

Background

This briefing contains Scottish Environment LINK's initial response to the Scottish Government's draft Land Use Strategy consultation. Under section 57 of the Climate Change (Scotland) Act 2009 a land use strategy must be laid before Parliament by 31st March 2011. Scottish Environment LINK produced its vision for a sustainable land use strategy in '[Living with the Land](#)'¹ in 2009.

General comments

- The draft Land Use Strategy (LUS) is a 'direction setter' and aspirational document, not a strategy with clear goals and action. LINK welcomes many of the ideas and statements within the draft LUS but believes that it is weak in its vision, goals and action, and it lacks specific commitments. In its current form, it is unlikely to move Scotland towards more sustainable use of land resources and the optimal delivery of multiple benefits, such as GHG emission reduction, increased physical activity, resilient communities and diverse local economies.
- Crucially, the draft LUS fails to live up to the expectations inherent in the 2009 Act as it does not set out proposals and policies to meet the Scottish Governments' *sustainable* land use objectives. The strategy laid before parliament should include actions and timescales to achieve sustainable land use. As such LINK believes that the draft is seriously inadequate and should be redrafted in order that the Scottish Government is able to lay a *strategy* before Parliament.
- Furthermore, the accompanying Strategic Environmental Assessment (SEA) does not provide a proper assessment of the impacts. An SEA should be a critical assessment of the impacts, not a document supportive of the Strategy.

Vision

- The consultation document does not present a clear vision for implementing a sustainable land use strategy. The vision states in general terms what it wants from land but offers no vision of working in a different way. LINK believes that new approaches are needed and should be part of the vision.

¹ <http://www.scotlink.org/files/publication/LINKReports/LINKReportLivingwithLand.pdf>

- LINK believes that an opportunity has been missed to make a visionary policy statement, to capture the imagination and to inspire future stewardship of Scotland's land.

Principles and Strategic Direction

- The principles within the draft LUS are weakly worded and are not explicit regarding ways of working. For example, there is no inclusion of sustainable development principles, such as living within environmental limits.
- LINK believes that the draft maintains the status quo regarding the economic benefits of productive primary land uses. It does not recognise the significant economic benefits that can be generated by other land uses, ecosystem services and multi-functional land use.
- 'Better consideration of the natural environment' is a disappointingly weak strategic direction given the current undervaluing and state of the natural environment, and the need for change.

Status

- The draft LUS does recognise its role in 'providing strategic direction', and usefully describes itself as a "key reference point". However, it needs a more definitive statement on how this Strategy should be incorporated into governance structures. Stating that '*..future planning policy can be informed by this strategy*' is insufficient. We would like more detail regarding its authority and how it will guide future policy making.
- LINK believes that the draft LUS should identify how gaps in government policy or strategy will be filled in order to achieve the vision and how these will be reviewed.

Scope

- The scope of the LUS, in terms of types of land use, land use benefits, and processes and systems, is not well defined, which makes its use open to confusion and argument.
- The draft LUS is clear in its role in supporting efforts to mitigate GHG emissions and to support Scotland's adaptation to climate change.
- LINK believes there is insufficient emphasis in the document regarding how to make urban land use sustainable. The emphasis is almost entirely on land-based jobs and rural communities with no substantive reference to the environmental aspects of urban land use.
- Tourism and recreation's economic importance in Scotland (worth >5% of GDP) is overlooked.
- It neglects less tangible objectives, such as landscape, cultural benefits and sense of place.

Process

- The draft LUS lacks clarity regarding how it will be developed and monitored in the future. LINK believes that this should be clear from the start and be related to the requirements of the Climate Change (Scotland) Act 2009.
- Little direction is provided on how the LUS should be interpreted locally and regionally.
- LINK strongly recommends that the Scottish Government establishes a high-level Stakeholder Forum to follow and guide the implementation of the Land Use Strategy.

Policy Integration

- The draft LUS's approach acknowledges the need to balance various conflicting requirements but does not offer a legislative or administrative governance structure to achieve this.

Ecosystem Approach

- The draft LUS recognises the ecosystem approach but the stated action in section 4.3 '*Demonstrate how the ecosystem approach might be taken into account*' falls short of what

LINK believes is the need for ecosystems to underpin decision making on land use in order to cost effectively achieve multiple benefits for society.

Delivery

- The actions identified are weak and unambitious, and do not constitute policies and proposals as required by the Act. These are direction setting agenda for further work to investigate ideas and direct Government thinking. In their current vague and unworkable form they are likely to have little impact on ensuring more sustainable use of land resources in the future.

This briefing is supported by the following members of LINK's Sustainable Land Use Task Force:

- Archaeology Scotland
- Woodland Trust Scotland
- John Muir Trust
- The Association for the Protection of Rural Scotland
- Scottish Allotments and Gardens Society
- Plantlife Scotland
- RSPB Scotland
- Living Streets Scotland
- Scottish Wildlife Trust
- WWF Scotland
- National Trust for Scotland