

RURAL AFFAIRS AND ENVIRONMENT COMMITTEE

SCOTTISH GOVERNMENT'S DRAFT LAND USE STRATEGY

WRITTEN SUBMISSION FROM SCOTTISH ENVIRONMENT PROTECTION AGENCY (SEPA)

Introduction

1. SEPA has prepared a detailed response to the Scottish Government's draft Land Use Strategy consultation. The purpose of this paper is to summarise our key comments to the Rural Affairs and Environment Committee, following the Committee's invitation to give evidence.

Vision and purpose

2. SEPA strongly supports the vision and also the purpose of the Strategy, with its focus on an '*integrated approach to sustainable land use*'. To be successful in the long term, land based industries must be sustainable, and as such, sustainable land management should be the ultimate aim, with the Strategy clearly showing how this will be achieved.

Objectives

3. SEPA strongly supports the objectives of the land use strategy. The importance of land as a non-renewable resource, essential to a sustainable environment needs to be fully recognised by an overarching land strategy. In general, the Strategy's objectives and strategic directions support the vision. The principles for sustainable land use have at least the potential to support delivery of the vision and objectives, although this will very much depend on the practical application of the Strategy by land managers. SEPA is therefore fully committed to assist with Scottish Government with the Strategy's finalisation and delivery.

Delivering the objectives

4. In order to provide a consistent and clear direction to land managers, it is important that the land use strategy should bring together and facilitate the delivery of all land policy, Government strategies and objectives in relation to land use. SEPA believes that the fully effective implementation of the strategy can only be delivered through the articulation and expression of national priorities at a regional level, and the introduction of adequate governance and strategy processes to allow that regional prioritisation and implementation. SEPA therefore believes to deliver good decision making and multiple benefits, that spatial and regional plans, strategies and priorities at regional level will need to be the next stage, leading to integrated land management.

5. Where existing strategies or objectives contradict or appear out of step with each other, the Strategy should provide the mechanism which allows these issues to be resolved. Likewise, it is important that the strategy fully considers the impacts that land use can have on environmental services and the potential for land to maximise the delivery of public goods and ecosystem services. Only by considering land use in this context can we achieve long- term sustainable economic development.

6. SEPA is concerned that whilst, in general terms, the objectives and aims are the right ones, it is less clear how the actions proposed will fully deliver the objectives. Without more specific detail on how these actions will be implemented, it is difficult to predict what exactly will be delivered. Further actions to support delivery could include the legislative framework and supporting regulation, economic incentives and support, voluntary measures, influence, focused advice, education and awareness, reporting, monitoring and assessment, research and development and partnership working.

7. We would therefore like to see consideration given to sharpening some of the existing actions and consideration of new ones. We also believe that there is merit in considering a formal monitoring system for the actions proposed.

8. In order to provide a consistent and clear direction to land managers, it is important that the Land Use Strategy brings together and facilitates the delivery of all land policy, Government strategies and objectives in relation to land use. The need to align policies for agriculture, energy, enterprise, planning and the environment needs to have a higher profile in the Strategy. Where existing strategies or objectives appear out of step with each other, for example targets in relation to forestry cover, biomass production and desires relating to food security, the Strategy should provide the mechanism which allows these issues to be resolved. Likewise, it is important that the Strategy more fully considers the impacts that land use can have on environmental services, pollution swapping, and the potential for land to optimise the delivery of public goods including achieving target greenhouse gas reductions. Only by considering land use in this wider context can we achieve long term sustainable economic development.

9. The delivery of Climate Change targets in relation to soil and peat sequestration or emission of carbon are not highly addressed in the Strategy and we recommend that this key issue is considered further.

10. For the Strategy to be successful, critical levels of uptake amongst land managers must be achieved through clear communication. Actions or measures must be in place to ensure steps can be taken to achieve the necessary uptake from land managers.

11. To help the actions deliver the objective there should be an additional action "to develop and implement policies, regulations and incentives better aligned with sustainable land-use objectives". We strongly welcome the need to influence post-2013 CAP reform, particularly the opportunity to better align public payments with public goods and ecosystem services.

12. SEPA also considers that greater clarity is required on the relationship of the Strategy with the statutory land use planning system. In particular, SEPA considers it important that the Scottish Government articulates more clearly the guidance or other processes it intends to develop to ensure that the Strategy is fully considered by local planning authorities.

13. While SEPA considers that the Strategy considers rural issues satisfactorily, we would support further consideration on urban land issues. In general terms, we also consider a number of core SEPA functions to be under-represented, including flooding management, pollution control, soil protection and diffuse pollution mitigation.

14. River Basin Management Planning provides a very useful platform upon which to integrate catchment management, and responsible authorities do have to have regard for the river basin management plans which is helpful in achieving integration. SEPA would therefore welcome working with the Scottish Government to integrate the River Basin Management Plans with the land use strategy, and that in particular we can see opportunities to get real benefits for both sustainable land use and improving and protecting the water environment.