

CONSULTATION QUESTIONS

PLEASE NOTE: Questions 1 to 10 relate to the Draft Land Use Strategy; questions 11 to 14 relate to the accompanying Environmental Report.

INTRODUCTION (Section 1 of the draft Strategy)

Vision – A prosperous and sustainable low-carbon economy, underpinned by successful land-based businesses, flourishing natural environments and vibrant communities.

Question 1a: Do you have any comments on the vision that we have proposed?

The vision is of course laudable, the key issues for consideration are the means by which the vision is realised. Essentially this requires some examination of the 3 stated objectives, and what actions will be required to achieve these. There will undoubtedly be challenges and conflicts which need resolution or mitigation; for example, whilst the 3 stated strategic directions are not mutually exclusive at strategic level, the closer one examines the activities associated with each of these then potential conflicts can unfold; for Scotland's wild fish and fisheries, this can include many areas, for example renewable energy, agriculture, freshwater aquaculture, forestry, access to land & water as well as clear risks posed by issues such as Invasive Non Native species. We hope that the "Strategic Direction: better consideration of the natural environment" will deliver improved mechanisms to ensure the natural environment can be safeguarded against injudicious or unsustainable development. This will undoubtedly require a detailed look at a number of policy frameworks, terrestrial planning regimes, other strategic and local/regional development plans.

Question 1b: Taken together, do the objectives and their accompanying strategic directions support the vision?

Yes, at a strategic level. As stated above, a key issue is how each of the 3 objectives relate to each other, as well as supporting the over-arching vision. Inevitably there will be balances to be struck between the 3 objectives, and competing issues will only be identified through the many detailed strands and actions which support each individual objective. This will be the real challenge.

PRINCIPLES FOR SUSTAINABLE LAND USE (as set out in text of section 1)

Question 2a: Is it useful to set out principles for sustainable land use?

Yes.

Question 2b: Do you think that these are the correct principles? If not, how would you like to see them changed?

The principles for Government policy making are generally acceptable in the broadest sense. However, while principle b. states that the regulatory impact on businesses should be "as light a burden....as is consistent with achieving it's purpose.....", we ask that this principle should also ensure that the regulatory regime is proportionate to the potential impact on the natural environment and is adequately framed to ensure risks are assessed.

SUCCESSFUL LAND-BASED BUSINESSES (section 3 of draft Strategy)

Objective – Successful land-based businesses contributing to Scotland’s prosperity and wellbeing

Strategic direction – towards a low-carbon economy.

Question 3a: Do you agree with the objective and strategic direction for land-based businesses?

Yes.

Question 3b: Have we focussed on the right areas to achieve this objective and move us in this strategic direction?

As part of this objective, we note that land based businesses will contribute more prosperity through goods that are produced and services delivered. Whilst we support this laudable objective and appreciate commercial considerations in a competitive global market, this should not be achieved at the expense of environmental considerations. How this balance is articulated and delivered in the strategy outputs will be important.

Question 3c: Are the actions identified the right ones to deliver the objective, and are there other actions which would be more successful or effective?

There should be an assumption made throughout the strategy, and articulated clearly in the vision, that land-based businesses should be environmentally sustainable, consistent with the low carbon message also presented in the vision. The absence of any reference to environmentally sustainable businesses is, in our view, a serious omission.

FLOURISHING NATURAL ENVIRONMENTS (section 4 of draft Strategy)

Objective – Flourishing natural environments delivering the widest range of benefits to Scotland, and playing their part in mitigating global climate change.

Strategic direction – better consideration of the natural environment.

Question 4a: Do you agree with the objective and strategic direction for natural environments?

Yes.

Question 4b: Have we focussed on the right areas to achieve this objective and move us in this strategic direction?

Yes, we are pleased to note that the strategy highlights the need to take an ecosystem-wide approach, and raises the risks posed by flooding, afforestation and other land practices. Whilst we fully acknowledge the role forestry will play on a number of levels, both as a vable industry and as an effective carbon sink, focus must not be lost on the negative effects of poorly considered forestry practices which continue to impact watercourses in parts of Scotland in terms of acidification. Due to decreasing emission loads the risk of future acidification impacts is reduced and reducing although there remain areas of legacy

acidification which will take many years to recover. In the meantime restoration measures are required to accelerate and support natural recovery. The action to identify more closely which types of land are best for planting is to be welcomed, and this must take into account the already well-documented issues associated with acidification on watercourses. Likewise, we welcome a more systematic and considered look at natural flood management approaches, which as well as reducing the impact of flooding in urban areas, will hopefully restore flow regimes in catchments to a more natural and ecologically acceptable level.

Question 4c: Are the actions identified the right ones to deliver the objective, and are there other actions which would be more successful or effective?

An important component linking to "Appreciating the benefits" of our natural environment is education and awareness, and it is important that this is considered as a sub action under this general strategic direction. Education is an important (and necessary) function of Scotland's fishery trusts (and many other rural stakeholder organisations in Scotland). It is vital that education forms a key part of this strategy and that resources are identified and made available to those that require them in the furtherance of the overall strategic direction. Educational initiatives are a common thread throughout all of the strategic directions.

VIBRANT COMMUNITIES (section 5 of draft Strategy)

Objective – Vibrant, sustainable communities in urban and rural areas, with people connected to the land, enjoying it and taking an interest in its future.

Strategic direction – connecting people to the land.

Question 5a: Do you agree with the objective and strategic direction for vibrant communities?

Yes.

Question 5b: Have we focussed on the right areas to achieve this objective and move us in this strategic direction?

The strategy identifies livelihoods as one of the strongest links to the land, particularly land-based industries. The strategy does not refer to training in this element, and in particular the need to ensure appropriate training for land-based industries is available and continues to be developed in response to demand. Without appropriate training, it is unlikely that the potential of rural businesses can be realised to their full extent; again the theme of training runs through virtually every strategic direction referred to in the draft strategy.

Question 5c: Are the actions identified the right ones to deliver the objective, and are there other actions which would be more successful or effective?

Yes, but please have regard to education and training which underlies many of the strategic directions.

DELIVERING SUSTAINABLE LAND USE (section 6 of draft Strategy)

Question 6a: What would be the best way of placing the national objectives of the Land Use Strategy in a local context to assist land managers and local stakeholders?

The national objectives, whilst free-standing in the wider context, do need to be translated into meaningful and tangible outputs which are capable of being understood and actioned at regional and local level. Perhaps this requires some form of action plan, which would identify key actions, who might deliver them and how they would be supported or resourced?

Question 6b: Are there other actions which would assist local decision processes?

As above.

Question 6c: Are there measures additional to those already in place which should be considered to encourage the restoration of vacant or derelict land to economic, social or environmentally productive use?

Possibly by promoting some underlying theme in structural/regional planning to ensure that this is considered by stakeholders such as local planning authorities. Economic, social and environmental drivers are not necessarily mutually exclusive and imaginative solutions might encompass all aspects of these.

GENERAL

Question 7a: Do you see any conflicts, either within this draft Strategy or between it and other policies? If so what are they?

As described earlier.

Question 7b: Do you see complementarities with other policy areas, which have not been explored in the draft Strategy?

No obvious ones.

Question 8: Are there any equality issues that the Strategy needs to address (relating to race, gender, disability, age, sexual orientation, gender identity or religion/belief)? If so, how could the Strategy be improved to meet those needs in a better way?

No comment.

Question 9: Are there any other groups in society that may be adversely affected by proposals in this Strategy? If so, how could the proposals be improved to meet their needs in a better way?

None.

Question 10: Are there any other points you wish to make about any aspect of this draft Strategy?

None.

QUESTIONS ON THE ENVIRONMENTAL REPORT

Question 11: Is there any other baseline or environmental information which could be used to further inform the Strategic Environmental Assessment? Please provide details and evidence to support your response.

Comments

Question 12: Do you think that the Environmental Report has captured the significant environmental effects of the Strategy? In your opinion has anything been overlooked? Please provide details and evidence to support your response.

Whilst 2.1.22 refers to the negative effects of forestry, such as disturbance to carbon retention in soil, it neglects to acknowledge the biggest regional impact on freshwaters in Scotland, namely the effect of poorly sited and managed plantations which can cause low freshwater pH levels in poorly buffered areas. This has had well documented negative effects on water quality and fish stocks and forest and water guidelines are not yet fully geared up to help mitigate these effects although significant improvements and refinements have and are being made at each review of these guidelines. Further issues include drainage associated with forestry and this should be highlighted as a key part of catchment wide natural flood management strategies.

Question 13: Do you agree with the measures for enhancement already adopted by the Strategy and the additional enhancement and mitigation measures proposed for the final Strategy? Please provide details and evidence to support your response.

In general, yes.

Question 14: Do you agree with the proposed arrangements for monitoring identified in the Environmental Report? Please provide details and evidence to support your response.

In principle, yes we agree that monitoring of the effects of the strategy are essential (and indeed legally required), however the actual arrangements for monitoring are not entirely clear in 7. We would also question the assumption that 'no adverse environmental effects have been identified' - this may be the case in terms of the untested draft strategy at the present time, however the monitoring system must be capable of identifying and responding to significant adverse impacts over the cycle of the strategy.