

## Response ID ANON-2SNG-88UA-Z

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

Submitted on **2016-01-20 10:39:20**

### 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.**

Farming, Local community, Environment

**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?**

No

**1b Please provide your reasons for your answer.**

## 1b:

On the whole, the vision and objectives remain valid. However, we think there is too little sense of urgency in linking the land use strategy to aspirations for a 'zero carbon Scotland'. The growth in renewable energy generation has been a success story for Scotland and we have much more potential than we are using (though the rewards should be more fairly shared: Nourish believes that the sun, wind and water which flow through our land are part of the commons and should benefit all). Similarly, the document could put more emphasis on carbon sequestration, and Scotland should sign up to the 4/1000 soil carbon initiative developed after Lima.

The positioning of the three principles appears to give more prominence to the needs of businesses to make a profit, rather than the desirability of Scotland's land based natural resources being used to deliver multiple benefits across all of Scotland. We all (not just businesses) need to adopt an eco-systems approach. Also, this section is the place to be clear about what difference the land use strategy is seeking to make, the problem it is trying to solve. For us, it could be put simply as 'more jobs from the land, more nature on and in the land, more people connected to the land'

It's not apparent that this policy has any linkages with the social justice agenda, and with the current "Fairer Scotland" agenda. We would recommend greater linkages being made here. For example, part of our approach to land use should be that all children and young people in Scotland get to experience the land of Scotland and this should be built in to our education system.

As well as connecting urban and rural communities to the land, this policy could usefully play a role in connecting the urban and rural to each other. Currently this role seems under-fulfilled. We would commend the desire to ensure that Land Reform, Community Empowerment, CAP, SRDP, Forestry and Agriculture visions, strategies and policies form a coherent picture, and relate to the Sustainable Development Goals to which Scotland has signed up but this is yet to be realised in practice. For example,

Sustainable Development Goal 15.9 states:

By 2020, integrate ecosystem and biodiversity values into national and local planning, development processes, poverty reduction strategies and accounts

This work should be integrated into the planning review and land use strategy. Likewise, the work by SNH for example on Natural Capital Accounting should run alongside the Land Use Strategy.

We are keen to see the emphasis on multiple benefits being translated into practice, and believe that (especially where public funding is at stake) public benefits, to be enjoyed by the many, should outweigh the provision of purely private benefit. We welcome the greater emphasis on partnership working and holistic decision making. However, it needs to be recognised that this requires time and resources to broker partnerships, mediate between conflicting needs and uses and reach sound, long term decisions. While we recognise that the current planning system is again under review, this holistic decision making does not often happen in planning - instead, sectoral approaches dominated by the needs to transport, housing and infrastructure often prevail.

The 10 principles appear to be a valuable aid to decision making. However, we are not clear what legal effect or weight these carry in determining (for example) local development plans or individual planning cases. It is not clear who decides the best primary use of land: if a landowner decides the best use of his land is an overgrazed deer shoot, it is not clear that there is any land governance or spatial planning mechanism which could decide differently.

The 10 principles do not fully capture the relationship between land ownership and land use, and perhaps this is for the statement on land rights and responsibilities. If land is to be used in the public interest and for the common good in Scotland, unearned gains from owning land should be restricted. Nourish would want to see for example a tax on derelict and vacant land; a tax on windfall gains from a change in use of farmland; fair rents; a shift away from Pillar 1 subsidies for land ownership towards payment for public goods, and a fairer share of revenues from renewable energy generation. We want to see a progressive reduction in land values to bring them into line with sustainable earnings from agriculture, and to reduce the cost of housing. Finally, we would see it as a matter of principle that every citizen in Scotland should have access to land to grow some of his or her own food; and to produce food for others.

Decisions involving peri-urban land are often contentious given the competing uses it may have. While land may often have a clear value (in food production, flood management for example), it is not clear that this value carries much weight against the development value of the land for housing, transport or other uses. Is there, or should there be, guidance on how these factors should be weighted or considered? For example, are we valuing the loss of potential for food production, carbon sequestration or biodiversity over 1 year, ten years or 100 years?

At the moment there seems to be little that can be done to protect valuable agricultural land from development. We need to protect this land from housing and greenbelt development and develop a "foodbelt" around our cities, which can satisfy the rising demand for local food. We need to safeguard our soil, which acts as a giant carbon store. We should be promoting agricultural practices that encourage the protection of our soil, for example agro-forestry, and agro-ecological and organic farming techniques. We should be

- safeguarding our agricultural land
- providing areas to grow food sustainably both within and adjacent to our cities and
- developing infrastructure to allow these businesses to process, distribute and sell produce on the local market. Developing an effective local food economy has capacity to reduce our carbon footprint, boost the local economy, develop skills and jobs, and improve our diets.

We need our planners, and those making land use decisions, to create the right conditions where these businesses and these facilities can flourish. We need to recognise the importance of food to our health, to meeting our carbon and conservation obligations, and to developing a resilient, productive low-carbon economy based on sustainable land-use. We are not campaigning here to prevent development, simply to ensure that the developments that take place are sustainable, safeguard our assets, and develop our community infrastructure, helping to deliver other public goods.

There is considerable room for investment in such enterprises. For example, the Community Empowerment and Land Reform legislation will make it much easier for communities to have their say in how local assets are managed or owned. The new rural development plan and LEADER packages will offer room for investment in co-operation and collaborative management and marketing for producers, and there will be opportunities to invest in infrastructure projects that may benefit our cities as well as our rural areas. All these measures should encourage job creation and skills development, increase community capacity and contribute to an increasingly diverse and attractive food and drink offer for our valuable tourism sector. For these reasons we would strongly encourage those making decisions on land use to pay specific attention to food issues.

## Natural Resource Management

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

Yes

**2b Please provide reasons for your answer.**

**2b:**

We agree that such an approach is desirable. However, as above, we need to ensure that less tangible or quantifiable benefits are capable of being given appropriate weighting in individual cases or development plans. In an age of public sector budget cuts, where many local authorities have arms-length development companies, this has not always been demonstrated in practice.

## Policy Alignment

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

Yes

**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 diagram is a useful visual aid, explaining the relationships and linking policies to Scottish Government outcomes. However, we would query whether the SRDP should sit above Good Food Nation or the Vision for Agriculture or below them, as a mechanism for achieving these policies. Should there also be a way of demonstrating the interplay of European policies such as CAP, CFP and EU Environmental directives with Scottish policies? We would also welcome better linkages between planning, land use and land ownership and place-making policies and agendas.

We also would want to see city-region planning processes such as SESPLAN have a stronger link to land use strategy objectives.

## Planning

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

Don't know

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

**4b:**

We agree that these measures could be useful. (In addition, as above, we would welcome better linkages with greenspace and place-making policies). However, unless these measures are translated into statutory guidance, national outcomes or regulations they may not affect the outcomes of planning decisions and may have little practical effect on development patterns.

## 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 proposed review and would advocate a much stronger role for agro-forestry, which can play a role in habitat and flood management, carbon management and sustainable agriculture. We welcome the moves the forestry commission have made in developing starter farms and community woodland management and would like to see further investment in these areas.

## 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:**

There could be advantages in having a single policy statement about land which deals with ownership, use and management. However, there may be challenges in drafting something that can cover both these areas and the range of bodies that it may apply to. It would be more important in our view to have a statement

clearly setting out the principles that will influence how we draw our legal rights and responsibilities. We would recommend that bodies such as CLAS and the Land Commission have an input here. The important point for us is that our land should be used in a way that delivers multiple benefits and for public benefits to be prioritised within that.

## **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:**

They can help inform decision making and the tools used in the regional pilots sound interesting. However, we are aware that some land managers found these tools inaccurate, which has the effect of diminishing confidence and buy in. To be effective, the data must be accurate. Having access to information held by the research institutes on flood risk, land capability, soil types etc would be welcome in principle, especially if it can be overlaid using tools displaying multiple levels of information.

However, it must also be available as freely as possible to have an effect for community groups and be user friendly. There are issues with the extent to which Ordnance Survey and ROS charge for information held by them.

### **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:**

We would like to link this to the development of a sustainable food atlas which looks at the current 'footprint' of Scotland in terms of biomass, nutrient and water flows, imports and exports - and describes a future scenario which is more resilient and resource-use efficient

## **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:**

Local authorities need to work working jointly as with SESPLAN. Scottish Water, SNH and SEPA should be engaged also.

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

#### **8c:**

The land use pilots started to make latent capacity manifest - opening up conversations about the potential for additional societal benefits from land use at catchment and regional level. Currently communities in rural areas find it difficult to see the big picture - how much food does this area produce, how much energy and biomass, how much flood prevention, how much wildlife does it sustain - and what the potential is for increasing these - and for settlements and livelihoods. Facilitating these scenarios to 2030/2040 takes away the imminent concerns about 'will there be a wind turbine outside my window?'

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

#### **8d:**

We agree that groups would need a defined remit. They would be a good place for sharing ideas and spreading information, so that people can understand competing uses and priorities but have potential to get bogged down in difficult or intractable individual cases or decisions. They would also require appropriate resources, both financial and in terms of officer time, and clear linkages and delineations with other bits of the system. Also some areas may lend themselves to larger groupings according to land type or population.

## **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:**

As above. Also not clear why this is restricted to rural areas when peri-urban areas often have most contentious land usage or complex factors to consider.

**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 agree that this could be useful if resourced appropriately. It would need to work well with existing or proposed bodies such as the Scottish Land Commission, Land Court, Crofting Commission and CLAS as well as bodies involved in supporting community ownership/management bids if involved in mediating in this area.

## **Agriculture**

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

**11:**

It's very difficult to answer this question when so little information is given on what is currently proposed beyond saying "there will be a suite of measures". We would recommend that all farms be required to conduct a carbon audit, and that the capacity of the current advice service to offer one-to-one, farmscale advice on greener agriculture be significantly strengthened. We need more low carbon and organic farms included in the monitor farm network and more research in this area. We should be supporting increased use of agro-ecology and agro-forestry. Subsidies for farming should be prioritised towards public benefit (carbon management, habitat, biodiversity and flood protection, access etc) rather than being paid according to the amount of land. They should also be subject to a lower cap on individual payments, with money being transferred to Pillar 2 CAP schemes, to develop environmental, community and other benefits.

We should be encouraging new entrants, and we should be looking to develop a more diverse farming sector, with a diverse range of products produced from mixed use farms. We also need to find ways of ensuring agricultural policies reflect the potential for urban and peri-urban production to make a contribution to our food production, both domestic and commercial.

The new organic action plan is a welcome step forward, but we would like Scotland to follow France's example and promote agroecology as the mainstream approach to farming.

## **Agri-Environment**

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

Yes

**12b Please provide your reasons for your answer.**

**12b:**

We agree. National policies must be able to reflect and accommodate local needs, problems and priorities. The ability to do this on a finer spatial scale than we currently do would be useful. However, the data used must be accurate if there is to be confidence in the system.

## **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?**

Yes

**13b Please provide your reasons for your answer.**

**13b:**

We agree that such an approach should help to focus public investment in the areas where it is most needed, and can have the largest effect/benefit. We would be interested in exploring whether this approach could also be tailored to urban areas.

We welcome the ECAF, and would encourage a shift in funding towards co-operative and landscape level environmental actions rather than funding at farm scale as this will yield better results.

## **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:**

For the approach to be adopted on a national basis, an urban pilot is essential. It would be even more useful if the pilot could consider how land use decisions in urban areas impact adjoining more rural areas and vice versa. In addition, land in these areas may be subject to especially competing demands or have higher concentrations of vacant, underused or derelict land. These decisions should not be made on a disconnected basis, especially in relation to issues such as food. Most of the demand for our food is generated by our cities, whereas most of our production and processing is in semi-rural or rural areas. It is impossible to develop a local food economy in Scotland without using our cities to generate significant demand. Developing growing spaces within cities also encourages better physical and mental health, more community cohesion, and better knowledge of food.

This pilot could be closely linked with the SNH-led green infrastructure programme and the work of groups like 'Edinburgh Adapts'. Nourish would like to see a 'college of urban food production' set up to promote and support this aspect of urban land use.

## **Upland Land Use**

**15a Do you think that a strategic vision could be useful for the uplands?**

Don't know

**15b Do you have any comments on this proposal?**

**15b:**

This merits more thought - but we have huge areas of uplands in very different areas of the country, so a one size fits all policy or strategy would be difficult to envisage.

Nourish is keen to see at-scale development of agroforestry on a significant proportion of our 4 million hectares of Grade 5 land as we think this could provide gains in terms of carbon sequestration, animal welfare, biodiversity, flood prevention and local employment in timber processing.

## **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?**

Don't know

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

**16b:**

In relation to the use of GVA in the agriculture sector as an indicator, this is a fairly crude measurement. As the agriculture vision points out there is considerable potential to develop in this area, however right-sized processing, distribution and retail facilities must be developed to exploit this potential.

## **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:

Documents such as Good Food Nation and the Vision for Agriculture are a useful starting point. However, they lack specific, measurable, deliverables which will be needed if we are to progress. At present these documents contain only glancing references to the land use strategy and will require much closer integration if policy coherence is to be achieved.

## **Equalities**

**19 Do you have any comments on the policies and proposals in this draft Strategy in terms of how they may impact on any equalities group, i.e. with regard to age, gender, race, religion, disability or sexuality?**

19:

## **Questions on the Environmental Report**

**20a Do you consider that the Environmental Report set out an accurate description of the current environmental issues/baseline?**

Agree

**20b Please give reasons for your answer.**

20b:

**21a Do you consider that the predicted environmental effects as set out in the Environmental Report are accurate?**

Agree

**21b Please provide reasons for your answer including further information you feel should be considered in the assessment.**

**21b:**

**22a Do you consider that the recommendations and opportunities for mitigation and enhancement are accurate?**

Agree

**22b Please provide reasons for your answer.**

**22b:**

**23 Are you aware of alternatives to the proposed policies that should be considered as part of the Strategic Environmental Assessment (SEA) process conducted for the draft Strategy?**

**23:**

## **Evaluation**

**Please help us improve our consultations by answering the questions below.**

**Matrix 1 - How satisfied were you with this consultation?:**

Slightly satisfied

**Please enter comments here.:**

**Matrix 1 - How would you rate your satisfaction with using Citizen Space to respond to consultations?:**

Slightly satisfied

**Please enter comments here.:**