

Response ID ANON-VB35-UVAX-4

Submitted to **Developing an Environment Strategy for Scotland**

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Questions

1 What are your views on the following draft vision for Scotland's environment and climate change policies?

Our draft vision is for "one planet prosperity". This means protecting nature and living within the Earth's sustainable limits, while building a more prosperous, innovative and successful nation:

There is certainly little to disagree with in that statement. However we have had over the decades many similar initiatives with excellent intentions, and the same challenges still face us, with an ongoing decline in biological diversity and abundance as evidenced in the recent The State of Nature report [1], and discussions about the extent of wild land and attrition of wild qualities in Wild Land Areas.

Wild qualities are not just the physical attributes of absence – of a lack of contemporary land use or human structures, but the perceived naturalness that derives from the natural processes that drive vegetation succession and river dynamics.

We believe that there is a need to have a vision, or at least a public discussion, for Scotland's upland landscapes, many areas of which are subject to extensive monocultures of management, with the fragmentation and isolation of semi-natural habitats that comes with it. It is in the large, remote and semi-natural areas of land that natural capital is greatest. It is helpful to remember that capital needs to be protected and not eaten away piecemeal over time. The economic and ecological imperatives are the same.

The statement would benefit from making clear that protecting nature and living within sustainable limits is the over-riding need, and the rest must follow within this envelope of care for the sustaining natural processes. The concepts of natural capital and ecosystem goods and services have gained currency in recent years, but in the area of 'provisioning services' more understanding of its meaning for low-intensity use is required in order to not degrade other natural services – regulating, supporting and cultural.

There is what appears to us a conflict of policy intention within the development planning system. The process is under pressure to enable development to meet one aim but at the expense of the government's own recognition of the importance and value of our mountain landscapes. The ongoing attrition of the fabric of the land through civic engineering in the uplands – specifically windfarm and hydropower infrastructure – has resulted in damaged landscapes. This perceived degradation of the landscape is as significant in a cultural sense as the ecological impacts.

The management of economic developments in the uplands suffers from a weak vision and lack of resources to monitor and implement existing policies. The stating of land and development management principles requires more attention to the results of the policies and decisions made. Monitoring often looks at outputs and not outcomes, where measures record activity, not the intended end result.

The environment in Scotland needs a champion within Government that can link sectoral activity and follow through on the good intentions. Scottish Natural Heritage used to advise Government on

the impact of policies and activities on the natural heritage; the watchdog role has been replaced by a new enabler of development role, with very mixed results in the planning system.

Sustainable Economic Growth is not the same as sustainable use of resources. The strategy would benefit from making a clear statement to that effect and reflecting in planning policy and development management that development activity can only be sustainable if it works within the environmental parameters.

[1] State of Nature 2016: Scotland. The State of Nature partnership.

2 What are your views on the following draft outcomes that will help to achieve this vision?

What are your views on the following draft outcomes that will help to achieve this vision?:

1. We are a climate leader and play our full role in limiting global temperature rise to well below 2°C. Challenging targets have been set by the Scottish Government and whilst carbon dioxide emissions from the energy sector has fallen we are still above the European average. Scotland has seen a decline in coal and gas electricity generation and an increase in generation from renewables. We question the sustainability of this as long as there is a high or increasing energy demand through economic activity. The impact of large-scale civil engineering works in the uplands has a visual impact on the landscapes that are an important part of economic and cultural value. A policy reliant on large-scale renewable energy developments without managing energy demand downward will increase the negative impact on upland landscapes and ecosystems.

2. We are a zero waste, resource efficient nation. We think this aspirational policy would be beneficial, but we are a long way from it with excess packaging materials derived from petrochemicals polluting the environment physically and visually, and creating energy demand in their production. See above point on energy demand, means to supply it and the resulting attrition of the wildness of upland landscapes.

3. Our biodiversity is protected and enhanced, supporting healthy ecosystems. There is good work being done, but it is currently insufficient. Agricultural policy needs greater adjustment to promote lower intensity use and diverse land management where it can be accommodated. A National Forest Strategy gives an opportunity for the same.

4. Our air, freshwater, seas and soils are of excellent quality. Soil conservation requires more effort. Lack of attention to soil management creates landscape scars in thin upland soils. Once eroded and washed away it is irreplaceable within a lifetime.

5. Everyone can access, enjoy and connect with nature. Access to the countryside is an essential requirement for mind and body, and a mature society will enable and inform responsible behaviour when taking access and managing land. Scotland's access legislation and Outdoor Access Code cannot be taken for granted and must continue to limit restrictions to access in both time and extent.

6. The global footprint of our consumption and production is sustainable. That implies a reduction from where it currently is. It would be helpful to acknowledge this in the Strategy.

3 What are your views on the draft knowledge accounts which will be used to help identify priorities for action in the coming years? What additional sources of key evidence can you add?

The draft knowledge accounts provide an assessment of the current situation regarding environmental topics and processes, and will be a useful reference source for tracking progress.