

Response ID ANON-VB35-UV12-E

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

Submitted on **2018-08-23 13:25:27**

Questions

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

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

APRS is the charity which promotes the care of all of Scotland's rural landscapes. At a national level we advocate better landscape and planning policies for rural Scotland; at a local level we advise the public on protecting and enhancing their local landscapes. We care as much for the lowland Green Belts that mean so much to urban populations as we do for Scotland's iconic high and wild places.

We welcome the use of "one planet" language to recognise that Scotland is currently living well beyond its environmental limits. However, "one planet prosperity" could apply to any country on earth. We suggest that the vision should be more specific to Scotland's role in the world as a relatively wealthy and developed country. The accompanying rationale could possibly refer to some of its particularly significant environmental assets, such as for example mountain and loch landscapes, peatlands or seabird populations.

If the final version of the Vision uses the words "prosperity" and "prosperous" it is essential that it clearly defines these terms. If by "prosperity" it means "material wealth" or "GDP" then this is fundamentally incompatible with the stated "one planet" aspiration. However, if it means "well-being", or has defined environmental and social as well as economic components (as suggested under 'Tackling global environmental challenges') then this should be made clear and an explanation given of how it will be measured. A definition of "nature" is also required; this should make clear that this covers landscapes, geodiversity and public enjoyment of nature as well as biodiversity.

The commitment to the four EU Environmental Principles in the discussion paper is most welcome, but little detail of them is given. The final Strategy should not just quote them but should explain precisely what each of them means and what mechanisms will be used to apply them in Scotland. The Strategy should also refer to the five shared UK Principles of Sustainable Development:

- Living Within Environmental Limits
- Ensuring a Strong, Healthy and Just Society
- Achieving a Sustainable Economy
- Using Sound Science Responsibly
- Promoting Good Governance

Again the Strategy should explain what these mean and how they will be applied in Scotland.

The Scottish Government (SG) must clarify the status of the Environment Strategy in relation to other SG strategies. Ideally it should sit at the top of the hierarchy above all others. This is because the environment is not just an issue which can be balanced against others; it is the non-negotiable context in which debate of all social and economic issues must take place. At the very latest it must be given equal status to the Economic Strategy.

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?:

These are all appropriate outcomes, but the order should be changed. Outcomes 3 and 4 relate to the protection and enhancement of our environment, so should come first, as they provide the essential framework and context for the other outcomes which relate to human interaction with the environment.

The discussion paper contains some excellent narrative about the importance of Scotland's landscapes, for example:

"... the beauty and uniqueness of Scotland's landscapes ... are precious in their own right"

"Scotland's nature is unique, with awe-inspiring landscapes ... found in few other places on earth"

"The beauty of our nature and landscapes is the essence of Scotland's global brand ..."

"Our landscapes and nature ... help to define who we are as a nation."

It is particular refreshing to read unashamed references to "beauty" in a government discussion paper, and we commend this for inclusion in the final Strategy. However, this welcome rationale is not followed through to the draft outcomes.

Outcome 3 should therefore include a commitment to protecting and enhancing landscapes as well as biodiversity. Best international practice on landscape protection and management is set out in the European Landscape Convention (ELC), to which the UK is a signatory. This is a Council of Europe convention rather than a EU one, so is not affected by the UK leaving the EU. Scotland's Landscape Charter (SLC) translates the principles of the ELC into a Scottish context, promoting celebration, understanding and care of Scotland's landscapes.

Each outcome should be accompanied by indicators which will demonstrate how progress towards the outcomes will be measured. Scottish Natural Heritage (SNH) would be able to supply suitable indicators for a landscape outcome derived from its Landscape Monitoring Programme.

Some of the grammar is clumsy, eg for outcome 1 we suggest either "We are climate leaders" or "Scotland is a climate leader" and for outcome 2 we suggest "Scotland is a zero waste ...".

References:

European Landscape Convention:
<https://www.coe.int/en/web/landscape/home>

Scotland's Landscape Charter:
<https://www.nature.scot/professional-advice/landscape-change/scotlands-landscape-charter>

SNH Landscape Monitoring Programme:
<https://www.nature.scot/professional-advice/landscape-change/scotlands-landscape-monitoring-programme>

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?

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

Given the significance of Scotland's landscapes set out so clearly in the phrases quoted above, there should be an additional knowledge account specifically on landscape. SNH would be able to supply all of the necessary information.

Reference:

SNH Landscape Change:
<https://www.nature.scot/professional-advice/landscape-change>

Additional Comments:

Protected Areas - the discussion paper refers to Natura 2000 sites and Marine Protected Areas but not to any other protected areas. The final Strategy should contain an unequivocal commitment not just to environmental standards and principles, but to the protection and management of protected landscapes, including National Parks, National Scenic Areas, Wild Land Areas, Special (or Local) Landscape Areas and Green Belts.

Scotland's Planning System - it is remarkable that the discussion paper makes no reference to the central role which Scotland's planning system plays in implementing environmental policy and strategy. Actions speak louder than words, so the Scottish Government's environmental performance will be judged as much by the decisions it makes on planning applications for major developments affecting protected sites as by all the fine words in its strategies and policies. The Environment Strategy should therefore contain a clear commitment to use planning powers to protect designated landscape and biodiversity sites from damaging developments. A similar argument applies to transport policy, which can also have significant effects on valued landscapes and habitats; again this is not mentioned in the discussion paper but should be addressed in the final Strategy.

Conflict between outcomes - the discussion paper does not explain how any conflicts which emerge between the various outcomes will be resolved. For example, conflicts can arise between renewable energy and biodiversity or between transport policy and landscape. The Environment Strategy should address this issue; the EU Environmental Principles and the Shared UK Principles of Sustainable Development will each have a role in this respect, and the Sandford Principle often provides useful guidance in such circumstances.:
https://en.wikipedia.org/wiki/Sandford_Principle

Process - given the central importance of the Environment Strategy, there should be a further stage in the process, in which a draft Strategy is produced for public consultation and submitted to the Scottish Parliament for its views on behalf of the people of Scotland, before the final Strategy is prepared.

About you

What is your name?

Name:
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What is your email address?

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Are you responding as an individual or an organisation?

Organisation

What is your organisation?

Organisation:
The Association for the Protection of Rural Scotland

The Scottish Government would like your permission to publish your response. Please indicate your publishing preference:

Publish response with name

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 exercise?

Yes

Evaluation

Please help us improve our consultations by answering the questions below. (Responses to the evaluation will not be published.)

Matrix 1 - How satisfied were you with this exercise?:

Slightly satisfied

Please enter comments here.:

Much of the narrative in the discussion paper is very good and well-written. However, only asking three questions on such a complex and important topic is very restrictive. The discussion paper covers a great deal which is not addressed by the three questions asked. There should have been a box for any other comments.

Also, eight weeks is not long enough for such an important consultation, which will no doubt have resulted in fewer responses being received than would have been preferable. Many NGOs have limited resources and need longer than this to read the discussion paper, circulate it to committee members or trustees with sufficient time for meaningful comments to be received and analysed before a draft response is prepared. Best practice developed over many years points to 12 weeks as being much more satisfactory.

Matrix 1 - How would you rate your satisfaction with using this platform (Citizen Space) to respond to this exercise?:

Slightly satisfied

Please enter comments here.:

Using this platform proved straightforward. However, common best practice in NGOs is to prepare a draft response to consultations for circulation to committee members or trustees for comments before preparing a final response; this is not easy when using such an online platform.