



THE MOUNTAINEERING COUNCIL OF SCOTLAND

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22/11/10

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Dear Sir / Madam

Scottish Land Use Strategy Consultation – MCoS Response

General Comments

The MCoS welcomes some of the statements in the document, and has concerns about others. The strategy states, “the way we use our land shapes landscapes, strengthens our sense of identity and builds communities.” Inappropriate land use can, however, also threaten our sense of identity through diminishing the features that are one of the primary bases of that identity, undermine the foundations of strong communities and harm the quality of our landscape. In the current form it is an aspirational document but not a strategy, which requires stated objectives and aims. The latter would permit monitoring of whether the strategy was having an effect, and whether the impact was positive. Currently the document fails to meet the requirements of the Climate Change Act 2009 as it fails to present policies that would achieve the Scottish Governments’ sustainable land use objectives.

The SLUS must explicitly co-ordinate with the National Planning Framework 2 and the Scottish Planning Policy as all three together will shape the way our land is used in Scotland. Without making the relationships explicit there will be perceived or real gaps horizontally and vertically across policy. The relationship between them is unclear from the SLUS. Clarity is also needed in what weight the SLUS will be given in decisions affecting the land.

The MCoS supports the aim that “we should also celebrate its [Scotland’s land] variety, its beauty and the many kinds of enjoyment it can provide.” We believe that integral to this is delivering the quality of Scotland’s land to future generations with no less quality and variety. We are concerned that the objectives and strategic directions on page 7 will not deliver this outcome for landscape as they are currently envisioned. The SLUS must not be used to benefit some uses to the exclusion of others; there is a risk that it will do just this through insufficient consideration of wilder landscapes that have a diffuse benefit for all Scots, not just local communities, and are perceived as unproductive landscapes. Wild landscapes are currently used for field sports, extensive grazing, recreation, branding for many goods and services, and are a central image for the identity of Scots. In delivering the currently-stated objectives these landscapes lock up a significant quantity of carbon in peat and other wet soils. A change in land use is likely to release at least some of this carbon. The SLUS should not undervalue these benefits.

1.1 Principles for sustainable land use

Principles for government policy-making

To achieve the predictability of policy as in a), the purpose must be clearly stated. By inference this is sustainable economic growth (SEG) but the SLUS does not define if there is a limit to that purpose. For example, where currently there is upland farming, field sports and landscape-based tourism activity there may be greater economic benefit in renewable development but is the overall residual benefit positive? The

outcome of policy does not appear to be explicitly predictable. Non-financial benefits such as wild landscapes that attract tourists, community identity and carbon storage must be balanced against purely economic growth. The document does not therefore advance the principles of land use beyond that already in place, and is therefore a missed opportunity for a positive movement forward where all ecosystem services and multi-function land use is progressed beyond the economic benefits of primary land use.

Principles for land-use decision-making

The MCofS supports the principle that, “opportunities for land use to deliver multiple benefits should be encouraged.” Wild areas frequently deliver multiple benefits such as soil carbon stores. They are also the areas frequently targeted for renewables developments. The other benefits of wild areas are discussed above, but it must be borne in mind that some land uses are mutually exclusive and multiple benefits are a useful guide for decision-making in these circumstances.

Principles for involving people:

The MCofS agrees with the principle that, “outdoor recreation opportunities and public access to land are important for health and well-being and should be encouraged.” This equally applies to wilder mountain and coastal landscapes that are often cited as beneficial to both physical and mental health. It is not just about the quantity of outdoor recreation opportunities, but also about the quality of those opportunities in the value that is placed on them and in the variety of their characteristics. Neither urban green space nor magnificent wild landscapes alone are sufficient.

2 Scotland’s land in focus

2.1 What land can deliver and the demands upon it

The previous section noted the importance of multiple benefits but concentrates here on the fact that, “Scotland is already a world-leader in terms of our ambitious climate change targets.” It is also a world leader in relatively accessible wild landscapes and close association with historical and cultural sites. There must be balance rather than concentrating on the narrow benefits of renewables which has the potential to result in a renewable monoculture, and goes against the commitment to multiple benefits.

2.2 What land provides

We welcome the recognition of landscape as an ecosystem service. The difficulty is that unqualified, landscape can encompass everything, including derelict land. The qualifier “clean is added to “water”, so a qualifier needs added to “landscape,” such as “quality landscape” or “aesthetic landscapes” for the expression to have any meaning in this context as a service needs to be something positive.

2.3 Opportunities in a low-carbon economy

It is true that, “Scotland’s international ‘brand image’ is based on our land and is vital in terms of promoting inward investment, tourism and exports such as food and drink.” This is very important, but there also has to be a reality behind the image. Genuine landscape-based tourism contributes significantly to the economy through outdoor tourist services, supplies, equipment retail and accommodation provision. The reality is important for the numerous visitors and residents in an area that wish to scratch the surface of this image and enjoy areas beyond the car and coach-based tourist roads. In the Highlands & Islands Enterprise (HIE) area alone, mountaineering is estimated to have contributed a net annual expenditure of £245.7m in 2002/2003 and the equivalent of 4,466 full time jobs with a further 1,737 indirect and induced jobs [Economic Impact And Development Opportunities For Outdoor And Environment Related Recreation In The Highlands And Islands - Walking And Mountaineering, George Street Research And Jones Economics 2003/2004]. This contribution must not be neglected in favour of more landscape-impacting economic activity. Renewables can be delivered in a sensitive way through maintaining a diversity of landscapes and not squeezing other land uses into areas that already provide direct social, economic and environmental benefits.

2.4 Optimising land use

The MCofS welcomes that statement that, “we need to aim for sustainable use of our land, whereby we maintain and enhance the condition of the land and achieve our social and economic objectives without depleting the value of our natural assets.” The “appropriate trade-offs” referred to should not be a strategy

for valuing one set of benefits over another, however laudable the objective; “optimising land use” is not the same as maximising economic growth.

2.6 Relationship with the planning system and wider policy

This section needs more clearly explained and made explicit, such as “where the statutory planning and development management system does not apply.” The MCofS would welcome a “key reference point” as this document claims to be, but without a clear explanation of what exactly is meant by “future planning policy can be informed by this strategy,” it is not a useful reference point. More detail is required regarding its authority and how it will guide future policy making.

3 Successful land-based businesses in a low-carbon economy

3.2.3 Multiple benefits

Maximising multiple benefits is an ideal outcome, however some potential benefits may be necessary to forego due to mutual exclusivity as was recognised in section 128 of SPP. The SLUS must also recognise the constraints of “limit.”

3.2.4 Strategic management of key resources

Truly strategic planning must be done at the national rather than local level as certain nationally important resources are localised. In the case of land of wild character, this is in Highland. This means if a strategy is drawn up at the local scale, nationally important, but localised, resources are diminished nationally in a higher proportion than if the strategy was drawn up at the national level. The MCofS strongly believes that, as with offshore wind development, there is an urgent need for a national-level strategy for onshore wind developments.

4 Flourishing natural environments benefiting our lives

4.1

The MCofS supports the objective of, “more carbon being stored in our soils and vegetation,” and believes this easily won method of achieving this benefit is to safeguard carbon-rich soils, which often are found in wild areas.

4.2.1

We welcome the explicit inclusion of quality landscapes and peoples appreciation of them as part of ecosystem services and that this be integrated into the ecosystem approach.

4.2.3 Carbon stores

The MCofS supports that statement that “we must protect and manage soil carbon stores wherever possible.” This includes avoidance of carbon-releasing developments on carbon-rich soils, including where the proposed development is for renewables where there are long payback periods. The carbon sink benefits of forestry are greatly affected by the lifecycle of the carbon locked in the trees. Further research must inform the types of forestry that are used for this purpose and a lifecycle analysis in order to deliver the maximum benefit.

5 Vibrant communities, connected to the land

5.2 Strategic direction: connecting people with the land

5.2.2 Enjoying the outdoors

The MCofS agrees that, “people value our world-famous scenery,” and from experience this is one of the main motivators for people to enjoy mountaineering. The SLUS must consider which features of the landscape Scotland is famous for, and from MCofSs experience one of the major features is wild land, and this is evident in the marketing of Scotland where in rural areas, it is the wildness that is marketed. Scotland cannot afford to sacrifice this basis of world fame in exchange for an economy based on renewables. These

landscapes are moulded by humans through upland farming, management for field sports, deforestation, etc. Some of these impacts have not been entirely benign but have been a reworking of natural features, so are in some way perceived as more acceptable. The lack of a national level strategic debate for Scots to decide the amount and location of land “planted” with wind turbines will continue to cause concern and looking back may not be perceived as the wholly positive on the scale that it is promoted currently. People need to be encouraged to accept change, but also listened to with respect to the type and extent of change, and with the full knowledge of the end point that may be reached if the current land use change direction, speed and extent is realised. This section states that the aim is, “change at a scale appropriate to the landscape in question.” It is unclear what this envisions as what is appropriate is a value judgement dictated by what the perceiver believes is an appropriate scale. Natural Heritage Indicator N3 Visual Influence of Built Development and Land Use Change (2008) states that “the extent of Scotland unaffected by any form of visual influence declined from 41% to 31% between 2002 and 2008” (www.snh.gov.uk/publications-data-and-research/trends/scotlands-indicators/natural-heritage-indicators/). The MCoFS believes that this is an inappropriate scale, particularly as change has accelerated since this statistic was recorded. The SLUS needs to managing change at a strategic level to truly deliver multiple benefits.

Please do not hesitate to contact me to discuss these issues further.

Yours sincerely

Hebe Carus (Ms)
Access & Conservation Officer