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NORTH EAST SCOTLAND AGRICULTURE ADVISORY GROUP

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Land Use Strategy Team
The Scottish Government
1D-North Victoria Quay
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Dear Sir/Madam

LAND USE STRATEGY FOR SCOTLAND

I write as Chair of North East Scotland Agriculture Advisory Group (NESAAG), a cross-sectoral partnership drawn from the public and private sectors comprising three local authorities, Scottish Enterprise and HIE Moray, agriculture, forestry, food safety and environment agencies, private and industry bodies including academic and research institutions, and industry and farming sector representatives.

I am pleased to enclose NESAAG's response to the 'Land Use Strategy for Scotland' consultation. NESAAG warmly welcomes the direction of travel set out in the consultation report to encourage integrated and enhanced delivery of food, fibre, energy and other benefits from the land of Scotland for its people.

Although the strategy rightly takes a long-term high-level view, there are many fine examples amongst Scotland's land managers today which show how a fully integrated approach to land management can help optimise sustainable economic growth and build community resilience whilst also delivering on biodiversity, soil and water quality, climate change, recreation and the landscape.

Yours sincerely,

Cllr William Howatson
Chair, NESAAG

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?
A land use strategy for Scotland is long overdue.

The strategy needs to take a long-term high level view and recognise the limitations of its direct influence upon land-use decision-making at a local level, especially in the short term, but it will have a clear role in shaping future support mechanisms and broadening land managers' appreciation of management alternatives and their underlying principles. Around 3% of Scotland is urban, with around 85% of the rural remainder in private hands. A prescriptive approach is therefore not appropriate and so change must be encouraged through a range of incentives, which may take some considerable time to work (or indeed may not work at all in some cases), but it is nevertheless time to plot the future course for how Scotland's land can best be utilised. Compared to many of its European neighbours, Scotland has a large land resource in relation to its population and there is plenty of scope for the land to better meet the needs and aspirations of the Scottish people. A prosperous, progressive and market-orientated rural economy will also require new mechanisms to reward land managers who deliver public benefits but who currently miss out due to market failure.

NESAAG broadly agrees with the proposed vision, but in keeping with a desire to see primary producers retaining a fairer return from the supply chain would suggest:

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

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

NESAAG agrees that the 3 objectives (covering enterprise, the environment and people) and their strategic directions support the vision.

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?

NESAAG agrees that principles should be set out so that there is clarity of purpose. However, given that the strategy will be very widely read, NESAAG suggests that its relationship with other strategies and Scottish Planning Policy should be more clearly stated at the outset.

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

In respect of government policy-making principles, long-term predictability of the policy framework is vital to enable land managers to make informed business decisions. NESAG agrees that regulation should be as light as possible and that incentives should be fair, efficient and cost-effective, and must encourage integrated land use and active land management which results in beneficial outcomes for the public. The incentives should also be sufficiently 'open' so as to avoid discriminating against innovative land-based ventures (such as deer farming under the current regime).

Regarding the principle of land use decision making, NESAG agrees strongly that special land types should be allocated for specific uses - in particular that prime agricultural land should be retained for food production. The Group also agrees that deep peat soils should be protected and managed to maximise carbon sequestration and storage and that other natural land forms could be used as nature intended (e.g. flood plains for water course management)

Bearing in mind the challenge inherent in better meeting the future needs of the people of Scotland from its own resources, it is critically important to protect and, where possible, enhance the productive capacity of the land, including the restoration of degraded land. And where it makes economic sense, Scotland should aim to meet more of its own needs. Recent growth within the food and drink and wood processing sectors has delivered economic benefits and enhanced self sufficiency but around 40% of the UK's food and 80% of its timber and timber products are still imported.

Poor grade and shallow soils may lack resilience in the face of drier summers and wetter winters resulting in an increased likelihood of erosion in uplands and deposition of sediment and consequent flooding in the lowlands. More frequent flooding events in future might justify interventions such as dams to regulate flow and harness energy. Much better soil management is needed in future to deliver sustainable agricultural intensification so that Scotland can play its part in meeting the Food and Agriculture Organisation (FAO) global projections for food production while maintaining and enhancing the environment.

NESAG agrees with the 'social' principles in respect of public access and recreation opportunities and that there should be proportionate scope for local people to contribute to local discussion on land use.

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. Achieving a more successful and sustainable land-based economy is perhaps the single most important facet of the strategy.

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

Decision making:

Generally, yes. NESAAAG suggests that 'good' decision-making is too subjective and would suggest instead 'informed' decision-making. With appropriate incentives, a database of objective research information and helpful case studies land managers can surely be encouraged to 'think outside the box' and consider alternative and more integrated forms of land use. But for most land managers on higher-grade land, food production will rightly remain the dominant land use and decision-making will be largely determined by land capability and forecast returns from the market.

Regulation and incentives:

As noted in 2b above, NESAAAG urges the creation of a stable policy framework to enable land managers to make informed long-term business decisions. NESAAAG agrees that regulation should be as light as possible. Publicly-funded Incentives should be fair, efficient and cost-effective, and should encourage integrated land use and active land management resulting in beneficial outcomes for taxpayers.

NESAAAG notes with some concern that 'incentives and other policies will be regularly reviewed'. Previous experience in agri-environment and woodland grant schemes has clearly shown that constant tinkering with incentives invariably causes a huge hiatus in activity and causes major disruption to the supply chain. Moreover any suggestion that imperfections in any future scheme will be quickly remedied will discourage uptake in the short term.

There is an absolute need for incentive measures to be carefully thought through before implementation, with pilot projects if necessary to address any problems. Thereafter stability and predictability will be essential. There will be enough volatility in commodity markets.

Multiple benefits:

Many private estates have a long history of exemplary multifunctional land use in which a synergic combination of agriculture, silviculture, renewables, country sports and tourism/public access happily co-exist. Many such estates are also renowned for their landscape value and environmental diversity and clearly have a role to play in showing the way. NESAAAG recognises that the same principles of integrated land use can also apply to peri-urban situations (where national planning policy applies).

Strategic management of key resources:

As noted in 2b above, there is a need for strategic management of key resources such as prime agricultural land which is relatively scarce in Scotland and needs to be safeguarded for food production. Whilst there is a presumption against housing/development on prime land, many settlements in Scotland originated as market towns in the heart of the most

productive land and their continued expansion to meet housing and employment needs has led to a reduction in the supply of the best land around towns (and can have indirect effects on how adjacent land is managed due to the close proximity of local residents). Proceeds from the sale of farmland are usually reinvested and where possible, poorer areas of land are selected by authorities for development so the net effects upon the farm business can be beneficial. Such development is invariably covered by Local Development Plan to ensure delivery of an appropriate long term settlement strategy for the greater good.

The Scottish Government has challenging aspirations for forest expansion but it is not clear at present how they will be met. The 2006 scoping study compiled by the Macaulay Institute into Future Forest Development identified afforestation potential on LCA Grade 4 and 5 land, which would avoid impinging on prime agricultural land or deep peat soils, but more recently there has been a rapid expansion of wind farms in upland forests to meet equally demanding renewables targets (80% of Scottish electricity demand to be supplied from renewable sources by 2020). How the principle of 'compensatory' planting to offset clear-felling for wind farms will work in practice remains to be seen (will it be 'acre for acre' or reflect net forest productivity? will there be aggregation of compensatory planting for economies of scale and ease of management? will it incorporate recreation and other benefits - consistent with integrated land use?).

Fundamentally, there is a need to recognise that some land currently in single-use agriculture is probably better off with more tree cover and that some areas under forestry would be more productive for wind energy (wind-throw hazard is the defining parameter for forest rotation length across much of Scotland). In any event, integrating multiple benefits into whatever happens to be the dominant land use needs to be encouraged and adopted as the norm.

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?

Government actions:

- a) Align regulations and incentives better to land use objectives
- b) Encourage land-based business to mitigate and adapt to climate change
- c) Utilise land use objectives to influence CAP negotiations and payment regime

NESAAG agrees with the government actions identified above but suggests it is also necessary to identify obstacles to progress and how they may be overcome. The land-based sector is perhaps uniquely placed to combine business improvement and productivity gains and still deliver a lower carbon footprint, but will only achieve its full potential when a suitable mechanism for assessing and rewarding appropriate management is in place.

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?

NESAAG notes that this section might also usefully incorporate 'the sustainable use of the natural environment to provide goods and services', on the understanding that the natural environment encompasses all rural land including agricultural and afforested areas. If adopted this would require a reference to the sustainably productive use of the natural environment in the objective (a fifth bullet point under 4.1).

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

Appreciating the benefits:

NESAAG agrees with the 'ecosystem approach' which incorporates a social dimension. It is essential to maintain a viable rural population in Scotland. NESAAG strongly supports the view that 'we should also take into account the true costs of different land use options by reflecting how they might impact on the ecosystem services we need' (e.g. clean air, water and fertile soil). Objective models are under development which will help land managers' decision-making by evaluating the economic, social and environmental consequences of land use alternatives.

Maintain, restore and enhance the natural environment:

NESAAG agrees that it is important for land managers to maintain and improve the environment by for example planting new hedges and shelterbelts and creating ponds to improve connectivity of fragmented habitats, and to protect biodiversity which is vulnerable to climate change and continuing in-migration of exotic plants, animals and pathogens such as *Phytophthora ramorum*. There is also evidence that previously benign endemic plant pathogens are becoming more aggressive, perhaps in response to hosts weakened by changes in weather patterns. Introduced pathogens such as Blue Tongue virus also pose a clear threat to livestock.

Soils are at the very heart of the strategy. NESAAG suggests that the traditional principles of good soil husbandry (which form the basis of organic farming) should be more widely adopted in conventional farming to maintain and improve soil fertility and resilience. This will help arable crop production to cope with soil moisture extremes and - in all probability - a reduced range of plant protection products and increasingly expensive inorganic fertilisers.

River basin management plans are already in place to improve Scotland's water courses and water quality. This response has already referred to the potential for natural flood plains to be better utilised to mitigate river spates and the possible need for more dams to regulate flow.

It would appear that Scotland has been sitting on a prize asset for thousands of years, the value of which is only now becoming apparent. Scotland's soil carbon stores - its deep peat bogs - could be extended by, for example, blocking drainage systems. Given the apparent value of appropriate management of peat soils to the nation, it should be relatively straightforward to incentivise land owners and managers to trade subsistence agriculture for carbon sequestration to deliver public benefits hitherto unappreciated and unrecognised.

The case for increased forestry planting targets in Scotland has certainly been reinforced by the climate change agenda but the consultation document fails to declare (apart from a reference to 'multiple benefits') its full support for more planting of commercial forestry. There are compelling economic and climate change reasons for a more explicit statement of intent, with the caveat that such planting must be on appropriate sites and incorporate other public benefits. The use of improved timber tree genotypes will result in faster growing trees which produce better quality and higher value timber suitable for use in construction, thereby locking up the carbon absorbed while the trees were growing.

Generally, there is considerable scope for a more integrated approach to tree planting on farmland (e.g. agroforestry and extended shelterbelts), especially on less productive soils and on land which is difficult to manage for other reasons (e.g. colonised by dense bracken), thereby offering shelter for livestock and the production of a local fuelwood source at the very least.

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?

Government actions:

- a) Identify types of land most suitable for tree planting and support best practice to maximise delivery of multiple benefits
- b) Develop a carbon accounting system to improve the understanding of the benefits of carbon rich soils and to secure effective management of soil carbon reserves.
- c) Use demonstration projects to identify and showcase exemplary land management.
- d) Demonstrate the 'ecosystem' approach as an objective tool in decision-making.
- e) Identify adaptation priorities arising from the above

NESAAG is generally supportive of the above actions and suggests that development of a credible carbon accounting system will be fundamental to fully and properly incentivising more integrated land management. But in the meantime, practical demonstrations and case studies at a local level, such as the recent joint initiative between Quality Meat Scotland and Forestry Commission Scotland on the benefits of woodland cover for livestock farmers can go a long way towards putting land managers on the right path.

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?

NESAAG agrees that there is a pressing need to connect (or reconnect) people to the land to improve their understanding of how land is managed and 'what it is for'. One might reasonably argue that there would otherwise be little point in giving communities a say in local land use matters, even though the consultation report advises that land use decisions should ultimately rest with those 'closest to the land'.

For those who question precisely who should be responsible for establishing this connection, the answer is the land-based sector itself which has in fact risen to the challenge by sponsoring organisations such as the Royal Highland Education Trust (RHET) and locally, the Royal Northern Countryside Initiative (RNCI) to work closely with schools to this end. But more needs to be done by the industry to improve knowledge and understanding amongst the public, particularly city dwellers. The line in the consultation document that 'people living in rural and urban areas each need what the other provides' is a very telling point.

NESAAG recognises that provision of affordable rural housing is vitally important in maintaining the vibrancy of rural communities, especially in areas subject to in-migration (e.g. due to outstanding natural landscape and/or proximity to centres of affluence), where the conventional housing market is not adequately serving the needs of first-time buyers. Innovative solutions are required, probably through greater provision in the rental sector. That a number of forward-thinking landowners have proactively provided rural homes for rent is to be welcomed (and further encouraged).

Elsewhere, the growth of farmers' markets across Scotland and the increase in demand for locally-produced food has also strengthened links between local producers and consumers, adding value for farmers and reducing food miles. The recent Housing Expo near Inverness demonstrated how the intelligent use of timber can contribute to better housing and to the local economy generally. Enhanced use of local materials is also consistent with a 'closed loop' in respect of local ecosystems. Even unfortunate instances such as flash flooding in towns has helped sharpen community awareness of upstream land management and possible mitigation measures.

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?

Government actions:

- a) Develop land-use aspects of Climate Change Adaptation Strategy to help communities adapt to change
- b) Identify and publicise ways for communities to contribute to land use debate and decision-making

NESAAG agrees with the stated actions. The composition and structure of many rural communities has changed enormously in recent years, particularly as city dwellers migrate to accessible rural locations (See SAC report 'Rural Scotland in Focus'). Indeed the rate of change seems likely to increase in future. Communities need to be forward looking and

ready to embrace new opportunities in diversified rural businesses, including generation of renewable electricity and heat.

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? NESAAG suggests it would be very difficult to place the objectives of a high level land use strategy into a local context without first developing a detailed geographic framework which takes account of the diversity and capability of Scotland's land. In effect, an indicative framework would be required to identify theoretically optimal forms of land use for land managers to use as they saw fit.

The question remains whether it is feasible or worthwhile or try to place the strategy directly into a local context or whether it should sit solely as a high level document above more specific strategies (e.g. on food or forestry). What is certainly true is that the timing of this consultation exercise will enable its findings to be fully factored into how agriculture and forestry is supported in Scotland under the Common Agricultural Policy from 2014 onwards.

Question 6b: Are there other actions which would assist local decision processes? NESAAG refers to the previous paragraph and suggests that aiming to influence land-use decision-making at a local level directly through the land use strategy or a successor document is likely to lead to duplication and may therefore be neither desirable nor achievable. What will be required to promote informed decision-making (on what is, after all, largely privately owned land), will be appropriate incentives, good quality technical information and relevant case studies, coupled with reliable sources of guidance for communities and land managers alike. Inflexible Single Farm Payment rules have also been cited by farmers as an obstacle to the creation of new shelterbelts and need to be reviewed.

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?

NESAAG agrees that ideally, all land should be used as productively as possible but cautions that there are limitations to what an incentive package can achieve if, for example the site is extremely disadvantaged or the land owner's management objectives lie elsewhere.

GENERAL

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

NESAAG sees the land use strategy as the means by which various government policies can be reconciled and given a fresh sense of momentum and purpose, given cooperation between stakeholders and agreement on objectives.

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

All relevant policy areas have been explored and there are several areas of overlap, which is not altogether surprising; after all the aim of the strategy is to promote integration.

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 equality issues need to be addressed.

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?

NESAAG considers that there are no groups in society who will be directly and adversely affected by the strategy. On the contrary, the aim of the strategy is to realise the full potential of Scotland's land for the benefit of all.

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

The time frame for the strategy is suggested as 2010 to 2050, which is not terribly long in the context of land use policy. But it is a start.

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.

No

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.

NESAAG notes the need for a detailed Strategic Environmental Report (SER) but would have welcomed a more concise document.

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.

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.

Yes