

**LIS RESPONSE TO DRAFT ENVIRONMENT STRATEGY
SUBMITTED TO SCOTTISH GOVERNMENT - 23.08.2018**

Consultation Q1: 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.

LIS Response

The Landscape Institute Scotland (LIS), is the professional body representing over 450 members in Scotland as chartered landscape architects (LI UK has over 5000 members) who are engaged with various project types and policy projects at all scales from inner city environments through to large scale rural settings and often with associated communities, very much welcomes this initiative to develop an Environmental Strategy for Scotland.

We also believe this strategic thinking is very much needed but needs to be consistent in mentioning nature AND LANDSCAPE throughout, in order to tie together and cross relate various aspects of environmental legislation and government policy including such as developing NPF4, feeding into Stage 2 and 3 of the new Planning Bill as well need for alignment with the Scottish governments own National Performance Framework. These, we consider are as important as other environment (ie biodiversity) and climate change policies and would also suggest that it would be worthwhile looking at how existing policies, such as transport, could also assist in delivering the proposed Environmental Strategy agenda aims and outcomes.

With reference to Q1 it is therefore heartening to see reference to a vision for "one planet prosperity" but we would question the meaning stated as we suggest that this is about more than "protecting nature" and since we are already existing beyond the "Earth's sustainable limits" that real "prosperity" needs to be more clearly defined as to what this includes - as it is not about just economic prosperity. (Glossary suggested to define such terms).

There is mention in the introductory paragraph of the Draft that "policies will play an essential role to " protect the beauty and uniqueness of Scotland's landscapes and nature" and then later in the following list of bullet pointed paragraphs there is no mention of anything related to landscape or for eg SNH's suite landscape character assessments which cover the whole country or guidance documents on landscape capacity for change that they have been developing and updating since 1990's and used extensively by all local authorities and others.

Intro 3rd bullet paragraph in the Draft mentions the "pioneering Landuse Strategy" 2016 but this has had little effect on guiding landscape change, not really recognising cultural or historical landscape and archaeological interests, and has no teeth since it is not connected to the Planning System or any other legislation and has in effect only so far resulted in data driven pilot studies in only 2 local authority areas, in Borders and Aberdeenshire, despite several stakeholder discussion events and a 2nd 5 year plan launched (for 2016-21).

However later in the Draft ES under "Safeguarding Our Natural Environment" there is recognition that "Scotland's nature is unique, with awe inspiring landscapes....." Later there is further recognition in "Our landscapes (and nature) have long provided an important source of inspiration for art, literature and music..... define us as a nation..... provide space for exercise inspiration....etc etc. Our comment here would be that while we commend the focus on these aspects this needs to be carried right through the strategy and more coherently, and especially in topics in the Knowledge Accounts - at present landscape is really only mentioned in "Value the Environment" account and hardly in the "Quality green space" account.

Overall we find that "protecting nature" is therefore an inadequate term and suggest replacing with "protecting our landscape and natural assets" as this would infer all environmental assets including soils, air, water, landscape, biodiversity and not limited by nature.

Consultation Q2: 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.**
- 2. We are a zero waste, resource efficient nation.**
- 3. Our biodiversity is protected and enhanced, supporting healthy ecosystems.**
- 4. Our air, freshwater, seas and soils are of excellent quality.**
- 5. Everyone can access, enjoy and connect with nature.**
- 6. The global footprint of our consumption and production is sustainable.**

LIS Response

LIS finds this list of draft outcomes to be too general and recommend that they be more specific and SMART, and as numbered bullets tends to suggest a hierarchy of intentions, would therefore suggest using bullet points without numbers. If there is to be hierarchy intended then surely 5) & 3) need to be at the top of this list for this Strategy?

Also landscape needs to be stated outright, as we strongly suggest that landscape is more than part of nature as inferred by 3) and 5).

Suggested rewording:

3) Our biodiversity and landscapes are protected, appropriately managed, and enhanced in order to support healthy ecosystems and environments.

5) everyone can access, enjoy and connect with nature and landscapes.

LIS does not necessarily find that 1) & 2) are the most important outcomes to achieve the vision of the ES per se, as they are already top priority areas of government policy outcomes regardless of the ES.

To assist with developing more focused, as well as inclusive outcomes in order to achieve the vision as set out in the Draft ES, LIS would like to suggest consideration of Action Points derived from an open debate on the Future of Scotland's Landscape that LIS initiated and hosted on June 5th 2018 in

the Scottish Parliament through a focused meeting of the Cross Party Working Group for Architecture and the Built Environment, convened by Linda Fabiani MSP, with a summary report soon to be published on the CPWG website. Particularly relevant for this Draft ES are our Action Points concluded from this debate which we will with our partners, be seeking to further. The AP's from this event clearly relate to developing a more robust Environmental Strategy for Scotland and are offered for consideration for inclusion in subsequent drafts:

- * Promote a coalition with shared interests in Scotland's landscape and place in order to support the Programme for Government with the skills and energy to drive the vision.
- * Create a new strategy lead on landscape within Scottish Government, which would assist in informing all aspects of government policy so as to gain maximum benefits of multifunctionality.
- * Promote a holistic approach to the planning, design and management of place, balancing community, economic, environmental, cultural and ecological values.
- * Monitor and document the importance and significance of Scotland's landscape and natural capital, providing robust evidence to guide future investment, management decisions and conservation measures.
- * Uphold Scotland's leadership and commitment to international best practice, to safeguard the importance of landscape for the quality of life and quality of place for all Scotland's people.

LIS considers that currently landscape matters in policy terms continue to tend to fall between portfolios/departments and therefore very much welcome the intentions in the development of this ES to cross refer between different parts of government and which could be significant in correcting this situation. Especially when, as it is already stated in the draft ES that "policies will play an essential role in our nations success.....It will protect the beauty and uniqueness of Scotland's landscapes and nature," An approach to achieving this needs to be consistent throughout the ES and the supporting Knowledge Accounts.

Consultation Q3: 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?

LIS Response

While LIS welcomes the intention of developing background datasets and identifying needs and directions through Knowledge Accounts in order to support the ES and interested to see a first attempt at defining these. It is nevertheless evident that the selection of K A topics is questionable as they appear to be an incomplete suite and inconsistent in approach. It is not clear how or why these were selected and how the format relates to the draft ES with past and future drivers with variable trend and data analysis along with various omissions on known landscape matters such as:

- Quality Greenspace KA where limited terminology/definitions used for access and a misunderstanding of the extent of benefits of greenspace for active travel, recreation, energy

generation, climate mitigation and adaptation, community and cultural activity benefits, ie not just about nature.

- Natural Capital KA does not mention landscape at all, when it is considered to be in effect an 'umbrella' or encompassing topic for considering composite natural capital and could be party to several KA's.
- Whereas Value the Environment Account mentions landscape in terms of urban landscape quality, wild land and peoples perceptions for the future and public surveys, but does not mention the Scotland wide landscape character data sets commenced in the 1990's or landscape capacity assessment for landscape change accommodation, and the new landscape monitoring programme that SNH has initiated.
- Access to nature - repeats other KA's, no demographics ie changing populations needs/aspirations
- Ecosystems & wildlife KA - Habitat connectivity and Developing Resilience not mentioned while this is a known key intention of developing Greenspace and ecological networks.

Annex A Table 3 useful but needs cross referencing more in ES if key UN Sustainable Development Goals relate to Key National Outcomes and therefore align to SG's National Performance Framework.