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Our case ID: 300046757

15 January 2020

Dear Land Use Strategy Team

## THE SCOTTISH GOVERNMENT – THIRD LAND USE STRATEGY

Thank you for your consultation on the Scottish Government's Third Land Use Strategy, which we received on 02 December 2020.

Historic Environment Scotland is the lead public body set up to investigate, care for and promote Scotland's historic environment. We are responsible for leading and enabling the delivery of Scotland's historic environment strategy, [Our Place in Time \(2014\)](#). Our priorities are set out in our corporate plan, [Heritage for All \(2019\)](#).

The preparation of all strategies and decisions on the historic environment in Scotland should be considered through the policies and principles within the [Historic Environment Policy for Scotland \(HEPS\)](#). Policy HEP3 in HEPS is particularly relevant to the Land Use Strategy:

Plans, programmes, policies and strategies, and the allocation of resources, should be approached in a way that protects and promotes the historic environment.

We have reviewed the consultation document in relation to our main area of interest for the historic environment. We offer the following comments and recommendations, which consider how the draft strategy performs against this policy framework.

### Land use and the historic environment

Scotland's landscapes and environments are almost entirely a product of millennia of human interaction. Past land management has developed our soils and archaeological deposits act as a reservoir for carbon and nutrient capture as well as preserving evidence of our past communities.

The historic clearance of forests led to the formation of habitable and farmable places, and also had unintended consequences. These include widescale peat growth and subsequent land management practices, such as waterway creation and manipulation.

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Food production has historically involved drainage, creation of fields, grazing regimes and woodland planting.

All of these actions have formed our physical surroundings and ecosystems. This has created the landscapes which contribute to Scotland's places, communities, wellbeing and identities. It also contributes to tourism. Historic Environment Scotland and NatureScot's joint position statement [People, Place and Landscape](#) sets out our joint vision for the management of our landscapes.

The historic environment is a finite resource, and it is highly susceptible to changes in land use and land management. This makes it vital that land use strategies and management regimes encourage stewardship of the historic environment. To do this well they must recognise the historic contribution to landscapes, habitats and ecosystems, and the joint benefits from sustainable land management.

The current version of the strategy misses the opportunity to fully recognise and imbed the historic environment in its visions and objectives. The strategy should give a wider interpretation of environment, and present both the natural and cultural factors of landscape.

The historic environment is a key component of our environment and it continues to deliver benefits at all scales, from individual assets to landscapes. These benefits must be sustainably managed. The strategy and its delivery plan should recognise this.

The strategy should make greater large-scale connections between the natural and historic environment and carry this approach in the decisions we all take in relation to how we use land. This will ensure that it is in line with Scotland's historic environment strategy *Our Place in Time*.

### Key recommendations

To support this approach we recommend the following changes. These are in addition to the consultation responses set out in the attached [Annex](#).

We have three key recommendations:

1. The Land Use Strategy should [recognise the strategic priorities](#) of the *Our Place in Time*.
2. Specific wording changes should be made to the [vision and objectives](#) of the strategy.
3. We should have [further involvement](#) in developing the strategy and its delivery plan.

More detail on each of these is given below.

### Recognising strategic priorities

One of the stated aims of the strategy is to bring together for the first time key strands of Scottish Government policy that affect land use. Considering this the strategy should

recognise and embed the Scottish Government's strategy for the historic environment Our Place in Time.

Our environment and its land uses are inextricably linked to the historic decisions that have been made by previous generations. Such decisions range from deforestation and agricultural improvement to the harnessing of our landscapes for hydro-electric generation.

Furthermore, much of our green and blue infrastructure is also part of our historic environment. The protections that have been brought through historic environment legislation have played a part in ensuring this infrastructure continues to deliver multiple benefits. For example, the protection and promotion of the canal network, and our gardens and designed landscapes and historic battlefields have all influenced how we manage our land resources.

There is no explicit link made to Our Place in Time within the draft document. A key cross-cutting priority of Our Place in Time is to mainstream the historic environment into the policies and strategies of the Scottish Government. It sets out links with other policy areas such as environment and rural development and business, industry and energy.

#### Recommendation:

The Land Use Strategy should recognise the strategic priorities of the Our Place in Time.

#### Vision and objectives

The way we use and manage our land provides the foundation to many aspects of our lives in Scotland, and the draft strategy highlights this. It also acknowledges that this has been the case throughout our history – and will continue to be the case in our future.

In our [response to the National Planning Framework Call for Ideas](#) (30 April 2020) we supported recommendation 12 of the Rural Planning to 2050 report which states:

NPF4 should promote an approach to planning which links the three goals of conserving of the natural and historic environment, responding to the climate emergency and sustaining more resilient rural communities.

The historic environment is mentioned very little in the draft strategy. The strategy aspires to be in line with other national strategies and policy. To achieve this, it will need to make strong clear links with historic environment and national planning policy.

#### Recommendation:

Specific changes to the wording of the vision and objectives. This will create a wider framework for the delivery plan to refer to when identifying actions. These can be found against the specific questions raised in the consultation response form and in the attached [Annex](#) to this letter.



### Further involvement

The draft strategy outlines a two-staged approach. The first step is a strategic document to be laid before parliament in March 2021. This will be followed a detailed delivery plan for consultation during the next parliamentary session.

Our response to the second Land Use Strategy raised a number of issues with the Ecosystem Services approach. We had specific concerns about the way this approach considers the historic environment through cultural service provision. In looking to address these issues we have actively sought to work with bodies such as NatureScot and Transport Scotland in developing greater understanding and representation of the historic environment within Natural Capital Accounting and Ecosystem Services Methodologies.

The way in which the historic environment is factored into these methodologies is significant in relation to both the strategic direction of the Land Use Strategy, and the specific deliverable actions that flow from it.

### Recommendation:

We can offer further support in developing the strategy and delivery plan. We would welcome the opportunity to work with you as the delivery plan is prepared, in order to ensure that the sustainable management of the historic environment is appropriately recognised within the proposed actions. This includes providing support in the establishment and implementation of the Land Use Strategy through the emerging Regional Land Use Partnerships.

We hope this is helpful. Please contact us if you have any questions about this response. The officer managing this case is Andrew Stevenson who can be contacted by phone on 0131 668 8960 or by email on [andrew.stevenson2@hes.scot](mailto:andrew.stevenson2@hes.scot).

Yours faithfully

**Historic Environment Scotland**



## ANNEX – CONSULTATION QUESTIONS RESPONSES

Where we have suggested edits to text, we have marked deletions with ~~strike through~~, and additions in [square brackets].

**Q1: Do you think that this vision still reflects the outcomes we need to achieve?**

B) No.

**Q2: If not, what key changes would you like to see for a new Land Use vision?**

We believe that the Land Use Strategy should consider our land in a more holistic way. The draft strategy is currently focussed towards the natural environment. A more place-centred approach would encourage a wider recognition of the multiple roles played by our land – and the benefits accrued from it.

The interplay between natural and cultural factors forms our physical environment; the strategy should reflect this. The sustainable management of our historic environment along with the natural environment should underpin the vision and objectives of the strategy.

The vision should recognise that our land provides for many uses and is not only a series of resources. We therefore recommend the following amendment to the vision:

A Scotland where we fully recognise, understand and value the importance of our land ~~resources~~ [assets], and where our plans and decisions about land use will deliver improved and enduring benefits, enhancing the wellbeing of our nation.

We would also recommend the following amendment to the introductory section:

Our land supports rural [and urban] communities and economies; food production to feed the nation; diverse habitats and abundant biodiversity; forests and woodlands; the generation of electricity to warm our homes and power our businesses; it defines our cultural and historic identity, and it provides inspiring landscapes and leisure space for us all.

**Q3: Do you think any of the above objectives need updating? If so, please indicate which you think needs changes.**

B, C and D. All three objectives should be updated as follows:

Land based business working ~~with nature~~ [sustainably with the environment] to contribute more to Scotland's prosperity.

Responsible stewardship of Scotland's ~~natural resources~~ [land] delivering more benefits to Scotland's people.



Urban and rural communities better connected to the land, with more people [understanding and] enjoying the land and positively influencing land use.

#### Q4: If you consider that one or more objectives need updating, please explain what changes you would like to see in the objectives

We have suggested three updates to the objectives above. Our reasoning for these changes area as given below.

#### Land based business working sustainably with the environment to contribute more to Scotland's prosperity

We encourage all land-based businesses to work sustainably with all facets of our environment including the natural and cultural. We suggest that the specific word “nature” is replaced with the wider term “environment”.

#### Responsible stewardship of Scotland's land delivering more benefits to Scotland's people.

Many of the resources referred to in the strategy have both a natural and cultural component: from crofting land to areas of agricultural reform to our water infrastructure, such as reservoirs. It is important to consider all aspects of our environment, and replacing “natural resources” with “land” gives a more holistic view of our environment and how it should be managed responsibly.

#### Urban and rural communities better connected to the land, with more people understanding and enjoying the land and positively influencing land use

Including “understanding” the land provides a better starting point to introduce change. This follows the approach set out in Scottish Government policy as reflected in the emerging NPF4, and aligns with Our Place in Time.

#### Q5: Before reading this document were you aware of the pressures on our land?

A) Strongly aware of all pressures on our land.

We are particularly aware of the impact upon the management of the historic environment as part of placemaking and managing change.

#### Q6: Are you aware of ways people can get involved in land use matters within your local area?

No comments to offer.

#### Q7: Do you think the landscapes are an effective way to communicate Scottish Government policy?

A) Yes.



We welcome the fact that the strategy communicates policy at the landscape level. However, the policy content has a number of omissions as drafted. It does not fully reflect the policy frameworks that influence decisions in these areas.

We would be happy to meet with you to explore how this landscape approach can reflect the contribution of the historic environment more fully and feed into the delivery plan for the strategy as well as the work of the Regional Land Use Partnerships.

**Q8: Under each landscape we have identified three sub-headings: Climate Change, Biodiversity and Communities. Do you think that these capture the crosscutting themes that are important to all of Scotland?**

B) No.

The [Rural Planning to 2050](#) report states:

NPF4 should promote an approach to planning which links the three goals of conserving of the natural and historic environment, responding to the climate emergency and sustaining more resilient rural communities.

Land use is not only a rural question, but the principle of this statement is widely applicable and we believe it should be reflected within the land use strategy. The three sub-headings as they are currently presented follow this model, but miss out the historic environment.

The section on offshore landscape makes a connection between land use, communities and the historic environment, but this connection is not fully reflected throughout the document. The connection between communities and the use of land is not new and each has always influenced the other. Historic decisions on the use of land continue to influence the decisions that we make today and played a part in creating the habitats that we now have.

It may not be necessary to add new sub-heading for the historic environment, but the communities sub-heading would benefit from a wider interpretation than that presented within the strategy. This should give an informed appreciation of the relationship between the historic environment and land use, including cultural factors.

Some small changes would bring a greater appreciation of the historic environment into the narrative. We suggest a number of amendments and have also identified potential links with other documents.

### Urban – Introduction (Page 12)

How we use the land in and around our cities and towns is crucial for many issues such as health and wellbeing, equality, environmental quality, [cultural identity,] managing drainage and flooding, jobs and housing as well as climate resilience and biodiversity.



### Urban planning (Page 12)

Through innovative and careful design and planning our urban areas can deliver to a multitude of uses in the same area. Urban forestry, renewable energy generation and natural flood risk management can exist hand in hand with greener housing, active travel, [enhanced historic environment,] improved infrastructure for recreation and initiatives to enhance biodiversity.

### Marginal Land – Restoring Peatland (Page 18)

As well as being a product of historic land use decisions our peatland offers multiple benefits in relation to the historic environment. [The National Peatland Plan](#) recognises such benefits as the preservation of remains of past peoples in peatlands as well the cultural impact of these landscapes on our national identity.

### Marginal Land– Helping our land support...Our communities (Page 19)

As Scotland's largest operator of visitor attractions we welcome the opportunity to work with all stakeholders in the development of sustainable tourism.

Through a new tourism strategy, we will work with VisitScotland [and other partners such as Historic Environment Scotland,] to develop an appropriate recovery marketing strategy, to identify short, medium and longer term market opportunities including nature based tourism to support and increase visitors.

**Q9: Does the content of the Land Use Strategy and the manner in which it has been presented, demonstrate that the Scottish Government is taking steps to help deliver sustainable land use?**

B) No.

The focus of the land use strategy is currently the natural environment. It should recognise that our wider environment is largely a result of the action of natural and cultural factors. The current focus limits how much the strategy can foster wider positive outcomes in relation to the sustainable management of our land.

**Q10: If you have lived experience or have studied the impacts of land use, land use change, or access to the outdoors on age, disability, sex, pregnancy and maternity, gender reassignment, sexual orientation, race, religion or belief, marriage and civil partnership, please provide us with details about this in the box below.**

No comments to offer.

**Q11: Are you aware of any examples of how the Land Use Strategy might impact, positively or negatively, island communities in a way that is different from its impact on mainland areas?**

No comments to offer.



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**Q12: Are there any particular current or future impacts you can think of on young people, (children, pupils, and young adults up to the age of 26) of land use, land use change, or any other aspect of the Land Use Strategy, positively or negatively. Please provide examples or evidence:**

No comments to offer.

Historic Environment Scotland  
15 January 2021