

Agenda Item	13
Report No	ECI/15/2022

HIGHLAND COUNCIL

Committee: Economy and Infrastructure

Date: 25 August 2022

Report Title: Scottish Biodiversity Strategy Consultation

Report By: Executive Chief Officer Infrastructure, Environment & Economy

1 Purpose/Executive Summary

- 1.1 This report provides a summary of the *draft* Scottish Biodiversity Strategy, currently out to public consultation (closing date of 8 September 2022), and a summary of the key points and issues, as they may affect the Council. The proposed Council response to the consultation, which draws together views from services across the Council, is included as **Appendix 1**.

2 Recommendations

- 2.1 Members are invited to:-
- i. **agree** the response to this consultation as set out in **Appendix 1**; and
 - ii. **note** the key points outlined in the draft Scottish Biodiversity Strategy set out below.

3 Implications

- 3.1 **Resource** – Given this is a high-level strategy it is unclear how this will impact on Highland Council resources at this time. Further information is likely at a later stage, and clarity will be sought as part of the Council's response to this consultation.

Some of the key issues driving biodiversity loss are already being tackled in part on the Council's estate, through funding from the Nature Restoration Fund and changes to National Planning Policy (including the forthcoming National Planning Framework 4). Although much remains to be done, biodiversity is a priority for the government and given the size of the Highland Council area, it is likely that a significant proportion of the required biodiversity improvements will be focused on this region.

- 3.2 **Legal** – There are no legal implications arising directly from the Scottish Biodiversity Strategy at this stage. However, it is currently unknown if new forthcoming legislation (the Natural Environment Bill), which will underpin the Strategy, will include additional statutory duties for Local Authorities in respect of securing biodiversity benefits and enhancements and biodiversity reporting.
- 3.3 **Community (Equality, Poverty, Rural and Island)** – The Scottish Biodiversity Strategy will have positive benefits across all communities, provided the correct policy and financial support is given to encourage the improvements (such as nature-based solutions to prevent flooding, improved community greenspaces and habitat connectivity, increased environmental understanding etc). Many of the Strategy's milestones relate to improving biodiversity that will also make our communities across the Highlands better places to live, work and visit.
- 3.4 **Climate Change / Carbon Clever** – The Scottish Biodiversity Strategy is directly aimed at restoring biodiversity across our land, freshwater and seas. There is a clear link between climate change and biodiversity loss; a decline in biodiversity will exacerbate the climate crisis and a changing climate will accelerate the rate of biodiversity loss. Conversely, measures to tackle the ecological crisis, restoring habitats and utilising nature-based solutions to adapt to a changing climate, will also help address the ongoing climate crisis.
- 3.5 **Risk** – The key risk associated with the Scottish Biodiversity Strategy is the lack of information on the financial and legislative support that will be needed to secure its implementation; it is expected that further detail will be provided in due course. There will be an expectation from Scottish Government and our local communities that the Council, as a key public body and decision maker, will act in accordance with the Strategy to help address the drivers of biodiversity loss, recognising the national and international importance of our landscapes, habitats and species. Given the twin reinforcing crises of biodiversity loss and the climate crisis, the Council will need to play an active part in halting biodiversity decline and restoring habitats if we are to deliver the aims of the Strategy and maximise our ability to meet climate change targets.
- 3.6 **Gaelic** – There are no Gaelic implications arising directly from this report.

4 Background

- 4.1 In light of mounting evidence that Scotland continues to experience dramatic declines in biodiversity, the Scottish Government is proposing an ambitious new Strategy to reverse biodiversity loss by 2045. The original strategy was published in 2004, and while the targets set out in this document have not been achieved it is important to note that there are now significant differences in both the political landscape and public understanding of the issues raised and addressed in the new strategy. The overall aim of the new Strategy is to deliver the transformational change needed to protect and restore terrestrial, freshwater and marine biodiversity in Scotland. The new Strategy is currently being consulted on by NatureScot.

Once all the responses are collated, a final draft will be presented by NatureScot.

5 Scottish Biodiversity Strategy 2022

5.1 In Scotland, almost all the land surface has been altered by human activity, resulting in one of the lowest biodiversity intactness indexes in the world. This undermines our ability to rely on our natural environment to hold on to its carbon stocks and sequester greenhouse gas emissions. In Scotland, the evidence of biodiversity decline is clear:-

- 24% decline in average abundance of (352) terrestrial and freshwater species since 1994, noting that 1994 was not a high point.
- 14% decline in range for 2,970 terrestrial and freshwater species since 1970.
- Peatlands are in poor condition, emitting, rather than storing, carbon and are now responsible for 20% of Scotland's total emissions.
- Indicators show an increasing spread of (190) established invasive non-native species (INNS) across terrestrial, freshwater and marine environments during the last six decades, with a northward shift a common pattern.

These statistics highlight the seriousness of the situation which the Strategy is seeking to address.

5.2 Purpose of the Strategy

The draft vision of the Scottish Biodiversity Strategy is that:-

'By 2045 we will have substantially restored and regenerated biodiversity across our land, freshwater and seas.

Our natural environment of plants, animals, insects, aquatic life and other species will be richly diverse, thriving, resilient and adapting to climate change.

Everyone will understand the benefits from and importance of biodiversity and will play their role in the stewardship of nature in Scotland for future generations'.

5.3 Ministers have defined two key milestones in the delivery of this strategy:-

1. reverse biodiversity loss by 2030; and
2. deliver the vision by 2045

5.4 The strategy is organised into 6 broad headings with a suite of outcomes under each:-

- **Rural Environments** (separated into farmland, woodlands/forestry, soils, uplands including peatlands);
- **Marine Environment**;
- **Freshwater Environments** (rivers, lochs and wetlands);
- **Coastal Environments**;
- **Urban Environments** (towns and cities); and
- **Across our land and seas** (overall ecosystem health, resilience and connectivity)

5.4 Full details of each of the milestones for 2030 and outcomes for 2045 can be viewed with the full consultation [here](#).

6 Scottish Biodiversity Strategy – Summary of Comments

6.1 The Council fully support and welcome the *draft* Scottish Biodiversity Strategy, which dovetails with ambitions already set out in the draft National Planning Framework 4 and should be a positive driver of biodiversity improvement throughout Scotland. The Strategy acknowledges the magnitude of the problems facing biodiversity in Scotland and recognises the issues driving biodiversity decline. We welcome the ambitious targets and milestones to address biodiversity loss and to deliver the improvements required.

6.2 The Strategy acknowledges that the 2004 strategy did not deliver the required outcomes. We welcome the new governance arrangements proposed to help ensure that this new strategy will deliver positive and transformational change to reverse biodiversity loss.

6.3 A summary of the key points is highlighted below with full comments included in **Appendix 1**.

- We are broadly content with the ambition in the Strategy and fully support the aims outlined. Given how poorly Scotland rates compared to other nations, the Strategy recognises the magnitude of the issues and offers a positive way forward.
- Given the size of the Highland region and the importance of its landscapes, seascapes, habitats and species, it is recognised that Highland Council will have an important role in the delivery of the Strategy.
- The Strategy, if it is to be successful and deliver the ambitious milestones and outcomes outlined, will need to be appropriately resourced and supported politically and through appropriate legislation.
- Whilst we support many of the 2030 and 2045 milestones, it is unclear at this stage how they will be delivered in practice. 2030 provides a very short timeframe in which to deliver the first set of milestones, many of which have specific challenges to overcome. If the milestones are to be met, progress must be swift.
- Significant investment and incentives for landowners are likely to be required at a national level, to encourage management for biodiversity. The strategy specifically mentions a reformed agricultural subsidy scheme which delivers for nature restoration, as well as high quality food production.
- Access to a suitably skilled workforce to deliver biodiversity enhancements is already a significant barrier to progress, as is access to materials, including trees ready for planting. If the milestones are to be met timeously it is essential that the workforce is appropriately upskilled and trained, and access to materials improved.

7 Next steps

7.1 The Council's response to the draft Scottish Biodiversity Strategy will be submitted to the Scottish Government by 8 September 2022. The response will incorporate any additional comments or concerns provided by Members.

Designation: Executive Chief Officer Infrastructure, Environment & Economy

Date: 1 August

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Appendix 1 – Proposed Council response to the draft Scottish Biodiversity Strategy Consultation

1 Introduction & Context

The introduction provides a useful definition of terms and gives a good outline of the national importance of biodiversity. We are pleased to see the link between the biodiversity and climate crisis highlighted and reinforced. Likewise, the Context section is helpful in demonstrating how the Scottish Biodiversity Strategy fits within the wider framework of related visions and strategies. We note that the Strategy will lead into the development of a series of rolling delivery plans, and we would welcome input into these as soon as practicable; these are clearly going to provide key information in setting out how the Strategy will be delivered. This section notes that new statutory nature restoration targets will be introduced through the Natural Environment Bill - further detail on these targets would be welcome, especially if these are likely to apply to Local Authorities.

Case studies may be a useful addition to the document to highlight good examples.

2 Evidence of Biodiversity Loss

Question: Using your own knowledge and the evidence presented, to what extent do you agree that there is a nature crisis in Scotland? Why do you think that?

Council response: The evidence presented in Section 2 clearly demonstrates the extent of the nature crisis in Scotland. The Highland Council formally declared a Climate and Ecological Emergency on 9 May 2019, and whilst we concur that there is increased recognition and understanding of the climate crisis in society as a whole, there remains a significant challenge in highlighting the importance of biodiversity, the vital roll it plays for all aspects of society and biodiversity loss in particular.

Question: What do you see as the key challenges and opportunities of tackling both the climate and biodiversity crises at the same time?

Council response: The twin issues of climate change and biodiversity loss are interconnected and interdependent. In many cases there has rightly been, and remains, a strong focus on climate-specific actions, such as hydrogen, reducing the carbon footprint of buildings, decarbonising etc. However, that same emphasis, sense of importance, urgency and understanding is felt less acutely in relation to biodiversity and the ecological crisis. This is reflected in the level of funding, resourcing and legislative support available to address biodiversity loss. The Strategy should look to deliver a greater degree of parity between the biodiversity and climate crises, reinforcing the interrelatedness of both, and ensuring there is a greater awareness of the benefits of realising nature-based solutions as a mechanism to tackle climate change, as well as the importance of tackling biodiversity loss, in its own right.

3 Strategic Vision

Question: Is the draft vision clear enough? Is the draft vision ambitious enough?

Council response: The draft vision is ambitious and welcomed. We would suggest that 'substantially' restoring and regenerating biodiversity is an imprecise measure that is open to significant variation of interpretation. It may be bolder – and more in keeping with the ambitiousness of the later outcomes – to reference a percentage of biodiversity that would be restored and regenerated by 2045, or reference (for example) the State of Nature report to clarify what levels the Strategy is aiming to restore nature to, i.e. bird species to 1970s levels.

The second part of the vision and specifically the reference to the natural environment adapting to climate change is welcome. However, this could be extended to include reference to how restored/regenerated biodiversity will contribute to tackling climate change.

The intention for the Strategy and biodiversity to be inclusive and take a whole of society approach is both necessary for its success, and a welcome addition to the vision.

4 How Will We Know When We Have Succeeded

4a Development of an Outcomes Framework

The two key milestones (to reverse biodiversity loss by 2030 and restoring and regenerating biodiversity by 2045) are both welcomed and supported.

The 2030 milestones are rightly ambitious and the short timescale for delivery highlights the need for urgent action. Nonetheless, a number of the 2030 milestones will be challenging to deliver within current frameworks and will need additional funding, clear (and enforceable) targets, appropriate resourcing and rapid development of a skilled workforce. Whilst it is clearly important that the Strategy is ambitious, for it to remain relevant in the long-term it must also be realistic, with the goals, targets and milestones achievable within the set timescales.

Similarly, we applaud the boldness of the 2045 outcomes associated targets. As with the 2030 milestones, successful delivery of the vision will require substantial support from amended or new legislation, especially in relation to large-scale land-use, including farming, planning etc. It would be useful for the Strategy to provide further clarity on the level of restoration and regeneration that is expected by 2045 and how will this be measured, and against what baseline? Is it, for example, realistic for substantial areas of peatland, woodland, salt marsh etc to be fully restored to a condition that operates efficiently for nature by 2045? A clearer, better-defined statement of what is expected in 2045 may provide greater clarity for all stakeholders, and ensure we are all working towards the same end goal.

Similarly, understanding the baseline against which improvements will be measured will be essential in understanding the success of the Strategy. Currently, other than the very broad State of Nature report, such a baseline does not exist.

Equally, a consistent methodology by which biodiversity enhancements can be measured, which can be applied across sectors across Scotland, would be helpful in demonstrating success or otherwise in meeting the Strategy's milestones and targets.

It was disappointing that a standardised metric was not taken forward as part of the NPF4 biodiversity enhancement policy (which will contribute to many of the milestones in the Strategy), and we would encourage a metric to be re-examined as part of the reporting mechanisms for this Strategy.

4.1 Scotland's Rural Environment – Farmland, Woodlands and Forestry, Soils and Uplands

Question: Do the 2045 outcome statements adequately capture the change we need to see?

Council response: We agree that the outcomes capture the level of the change required, and also acknowledge the significant action required to deliver change. We are pleased that the Strategy highlights that farming for biodiversity and high-quality food production can go hand in hand.

The section titled 'Towards a Nature-Rich Landscape in the Lowlands' will require significant political backing, investment, funding, and education to deliver.

Grouse moor management contributing to high standards of sustainable land use in upland areas is referenced as a 2045 outcome but has no allocated 2030 milestone. It would be useful if a milestone was identified that will help in the delivery of the 2045 outcome, especially given the specific challenges involved in this particular case.

Question: Are the 2030 milestones ambitious enough? Are we missing any key elements?

Council response: We agree with the 2030 milestones which reflect the many different and challenging strands to delivering biodiversity in rural environments. Many will require significant and immediate action with resources and funding to support effective delivery.

Whilst we agree that the reduction in deer numbers and control of invasive non-native species are both significant issues to address by 2030, we are concerned that this is a very short time frame in which to bring about the necessary changes. We look forward to the rolling action plan to provide greater clarity on these issues in due course.

The proposed large-scale upland biodiversity regeneration is admirable in its ambition and intention. However, it is currently unclear how this will be achieved by 2030. If this is to be delivered it will need to be economically advantageous for landowners and supported by suitable funding/grants. Again, the rolling action plan will be key in unpicking the complexities involved in delivering this milestone.

Question: What are the key challenges for this outcome area?

Council response: We are pleased to see reference to Invasive Non-Native Species (INNS), recognising the significant damage they cause to habitats and native species. It is, however, important that INNS are tackled on a landscape scale and in a co-ordinated way; the Strategy could play an important role in ensuring that this happens more often than at present. We would also like to see consideration given to adding more INNS to Schedule 9 of the Wildlife and Countryside Act or imposing statutory notices to remove INNS on a case-by-case basis to aid eradication from an area and regeneration of native species. This may also be an opportunity to look at reviewing regulations around the sale of INNS, for example *Rhododendron Ponticum*.

Question: What are the key opportunities for this outcome area?

Council response: The Council is keen to highlight the Flow Country World Heritage Site bid which clearly demonstrates the opportunities created for all stakeholders when biodiversity and climate change are considered side-by-side. We would suggest this may make a good case study.

Carbon trading/banking is both an opportunity and a challenge in Highland. It may encourage positive land management for biodiversity but also encourage increased competition for large scale land purchase without securing local benefits.

As well as encouraging new planting, the Strategy should provide an opportunity or a policy hook to review and improve statutory protection for our existing woodlands, and to provide a greater level of protection for, for example, intact areas of ancient and native woodlands.

4.2 Marine Environment

There is an overlap between outcomes for the coastal and marine environment, especially regarding the abundance of marine and coastal bird species. The two are intrinsically and functionally linked and so in reality many of issues, challenges and opportunities overlap. However, for the purposes of the Strategy we agree that it is preferable to have clear distinctions between the two environments and separate outcomes.

Question: Do the 2045 outcome statements adequately capture the change we need to see? Are the 2030 milestones ambitious enough? Are we missing any key elements?

Council response: The outcomes and milestones are very broadly defined and without detail on the actions or mechanisms required for delivery; this again highlights the importance of the rolling action plans, and the fundamental role these will play in setting out the detail and ensuring a coordinated approach across all stakeholders. We would note that the development of Regional Marine Plans are one such potential delivery mechanism. Regional Marine Plans would be an opportunity for local authorities, coastal partnerships, and other stakeholders to help guide development in the coastal and marine environments in a way that contributes to the Strategy's outcomes.

INNS are a significant problem in the marine environment and should be acknowledged and included in the 2030 milestone and 2045 vision.

Question: What are the key challenges for this outcome area?

Council response: All Councils face challenges where competing policies direct Planning Authorities to support development that will have an adverse impact on the environment (albeit within an acceptable limit at a project level). In this case, there is a potential conflict with the draft NPF4 and specifically the omission of the aquaculture sector from the requirement to deliver biodiversity enhancements through new development. It is, therefore, possible that the Council may find itself in a position where policy dictates a position of support with no requirement for the developer to contribute towards wider biodiversity outcomes. This would result in the Council supporting development that has a negative impact on the achievement of the Strategy's marine outcomes. Further discussion on this issue, and how it may be best resolved, would be welcomed.

To meet the 2030 milestones (and deliver the 2045 vision) there are a number of specific challenges that will need to be overcome, such as depletion of fish stocks and biodiversity in inland waters, dredging (and a lack of active regulation and enforcement of dredging, including in Marine Protected Areas) and pollution (including light pollution, pollution from fish farming and litter). Nationally, more research and work is required to tackle diseases, such as avian flu as well as disease/parasites resulting from aquaculture.

If the milestones and targets are to be met it may be necessary to give consideration to additional protection of spawning grounds, increasing the number and size of Marine Protected Areas, as well as more active policing and enforcement of activities within Marine Protected Areas.

4.3 Freshwater

Question: Do the 2045 outcome statements adequately capture the change we need to see?

Council response: Yes, we agree the outcomes capture the change required.

Question: Are the 2030 milestones ambitious enough? Are we missing any key elements?

Council response: Compared to the milestones of other sections, these appear less well defined and do not share a similar ambition. They also appear disconnected to the 2045 outcomes. However, as is recognised elsewhere, the issues effecting freshwater environments are extensive. We would suggest adding a new milestone that references the benefits for biodiversity by restoring freshwater habitats (i.e. 'Catchment, rivers, lochs and floodplains restored, deculverted, renaturalised [etc] to improve freshwater habitats for biodiversity'). The existing bullet point can then address the positive impacts this has in addressing climate change.

Whilst the species listed in the second bullet are not problematic *per se*, it would be useful to consider including keystone species that determine whole health of habitat, for example Daubenton's bat, freshwater pearl muscles etc. Beavers and salmon recovery, whilst important species in freshwater habitats, are not keystone species.

As with most environment types, the presence of INNS is a significant barrier to meeting the 2045 vision and tackling such should be included as a 2030 milestone. INNS have a significant impact on all freshwater environments with funding to control them often *ad hoc*, which limits effectiveness and often results in eventual re-colonisation. INNS should be dealt with on a catchment-wide level, with appropriate coordination and resources.

Question: What are the key challenges for this outcome area?

Council response: More education is needed to improve awareness of recreational impacts, including improved signage at problem sites and/or potentially restricting activities on some rivers and inland waters to prevent significant impacts to species and habitats. Pollution (including inappropriate lighting) could also be highlighted within the Strategy.

Compensation flows on hydro-electric schemes are calculated on the basis of historic and current rainfall/climate. Considering the changing climate these may need to be recalculated to reflect this and make improvements for biodiversity.

4.4 Coastal

See comments in the marine section above.

Question: Do the 2045 outcome statements adequately capture the change we need to see? Are the 2030 milestones ambitious enough? Are we missing any key elements?

Council response: Highland has the longest coastline in Scotland and recognises the significant challenges that climate change and rising sea levels brings to its communities. Therefore, ensuring a healthy and robust coastal environment is a key concern. The issues are described clearly and both outcomes and milestones appear to capture the scale of change required,

We would note that the emphasis on nature-based solutions and their importance in adapting to and tackling climate impacts is seen as crucial by the Council. We would like to see this milestone given more prominence or expanded upon, especially in relation to using nature-based solutions as a nature-positive way of mitigating climate-related impacts on human populations and infrastructure.

Question: What are the key challenges for this outcome area?

Council response: There is increasing pressure on coastal dunes and grasslands for recreation and associated development, and this needs to be balanced with biodiversity considerations. It may be that more nature-rich coastal environments need statutory protection or greater levels of protection.

4.5 Urban Environments

Question: Do the 2045 outcome statements adequately capture the change we need to see?

Council response: Yes, the outcome statements generally capture the change required. However, the first 2045 bullet, by simply referring to 'towns and cities' potentially limits the ambition of the outcome. This would be better if broadened to include all urban areas (including villages etc). 'Measurable increases in urban biodiversity' seems imprecise, and the document lacks any reference to how to measure biodiversity or what increase it seeks to achieve. This is unfortunate as the metric for recording biodiversity baselines and enhancements which the Council sought as part of their response to NPF4 (and as successfully used elsewhere in the UK) appears to have been rejected as part of the draft Developing with Nature Guidance, yet could have useful application in this case.

Question: Are the 2030 milestones ambitious enough? Are we missing any key elements?

Answer:

The second bullet would benefit from expanding upon – it is not clear what is meant by nature-richness being a 'feature' of all developments, and this is open to considerable interpretation. It is assumed that the policies in NPF4 and associated guidance would give more detailed direction in this regard.

The third bullet regarding retrofitting of green and blue infrastructure to enhance biodiversity could be more ambitious. There is a need to do more than just 'identify' these areas by 2030. Given the time it takes for the establishment of biodiversity enhancements, nature-richness as a feature should be promoted now, to meet this target.

This may also be a useful area to highlight key case studies demonstrating 'nature-richness', and varied scales of development would help to illustrate what is expected.

Question: What are the key drivers of biodiversity loss in this outcome area?

Council response: The key drivers in urban landscapes are numerous. There needs to be more encouragement, both in policy and legislation, for decision makers and developers to build in and value biodiversity, both for its own sake and as an important part of placemaking. There needs to be a requirement for long-term management of sites created to enhance biodiversity and preference for brownfield rather greenfield development. Where there are competing pressures for land, biodiversity should still be part of the final solution and not viewed as an easy sacrifice. Education is essential to improve public understanding and raise awareness within local communities of the benefits of biodiversity initiatives, i.e. reduced grass cutting, reduced verge maintenance etc and ensuring that urban green space is also valued for biodiversity.

Question: What are the key opportunities for this outcome area?

Council response: There is significant potential across existing urban areas and to build upon recent events, such as Covid-19 and the increased need for urban cooling. Strategies to develop biodiversity across a locality (e.g. town or city wide) should be encouraged, with the community taking a lead role in delivery where possible. There is significant potential to link-up with other opportunities, i.e. the open space strategy, play sufficiency strategy, flood risk and drainage and local food growing strategy to maximise benefits.

Question: What are the key challenges for this outcome area?

Council response: In development management terms, we are hopeful that new policies within NPF4 will provide a sufficient policy shift to start delivering biodiversity improvements in urban environments that support the Strategy. However, the Strategy could play an important role in defining what those improvements should look like and providing further support for their implementation.

In delivering the outcomes and milestones it will be important that records of the function and value of planned biodiversity enhancements are kept, ensuring the enhancements secured through one development are not undermined by another, especially given the time it takes for some biodiversity enhancements to reach maturity (for example tree planting). This will also ensure habitat connectivity across difference developments. It is also important that supporting guidance references the need to secure ongoing maintenance/management of sites. This could include the biodiversity function of less managed or unmanaged areas.

The Council recognise that urban greenspace, while crucial for people also needs to have biodiversity value and that some areas may need to be set aside and managed primarily for nature.

The Council recognise we have an important role to play across all areas of the Strategy, but this role is amplified in the urban environment. The Council are keen to investigate and where practicable implement biodiversity improvement opportunities to support the Strategy. We recognise that there is a need to integrate ambitions across Council services by joining up existing policies and strategies, ensuring in-house expertise is available across the Council and that we take a collaborative approach to delivering positive outcomes for biodiversity. On our own estate we are looking to continue creating and maintaining wildflower areas, tree planting, increasing areas set aside from management and develop new community food growing areas. For Council developments biodiversity will be considered early in the design phase with key stakeholders engaged from the outset.

There are, however, many challenges for the Council in delivering biodiversity improvements, and it would be useful if the Strategy could support public bodies in making, what are in many cases, fundamental changes to service delivery. For example, providing access to expertise, resources, materials and funding to deliver and maintain areas of enhanced biodiversity. The Strategy's milestones and outcomes provide a useful framework but would benefit from a more detailed and targeted delivery plan that can be used by Council's to implement change across the organisation.

4.6 Across Our Land and Sea

Question: Do the 2045 outcome statements adequately capture the change we need to see?

Council response: Yes, the outcome statements capture the change we need. The fact that both Scotland and the UK as a whole rank in the bottom 25% of nations for biodiversity intactness is a startling and sobering statistic. How the Strategy will measure increased resilience and ecosystem health, and against what baseline, however, is not detailed but will be an important indicator of success. The Council recognise that we have influence across many different areas and activities, and we are therefore in a prime position to start working towards addressing the outcomes that contribute to the health, resilience and connectivity of our ecosystems.

Question: Are the 2030 milestones ambitious enough? Are we missing any key elements?

Council response: The Council support the principle of developing nature networks. However, further detail on how (and who) will spatially identify the networks, the mechanism by which they will be embedded in land use planning and management, and the status they would have, and what (if any) resource implications there are for the Council, will need to be clarified. We would welcome further discussion on this issue.

Question: To what extent will these outcomes deliver the Vision? What might be missing?

Council response: Other than where noted, the proposed outcomes go towards significantly delivering the vision – assuming they are realistically deliverable in the timeframe available. Whilst we applaud the ambition, we feel there are milestones that will be difficult to fully implement. However, we await the rolling delivery plans with interest, and assume that these will provide the detail which the Strategy understandably lacks.

It is also notable that some of the milestones and outcomes may not be fully achievable until a different milestone has been met. For example, fully restored peatland with a flourishing ecosystem and intact native woodlands with a thriving biodiversity are unlikely to be successful until overgrazing and deer numbers have been addressed. Likewise, freshwater environments cannot be fully restored until INNS have been eradicated on a catchment-wide scale. Developing a delivery plan (by area) to ensure enhancements are delivered in a logical order over a realistic timescale would help ensure against wasted time, effort and resources, and give a clear order and timeframe for delivery.

Question: What evidence and information should we use to assess whether we have delivered the Vision?

Council response: For strategies such as this it is important to demonstrate that milestones have been met, that visions have been delivered and that the strategy has successfully implemented positive change. However, measuring success is one of the fundamental challenges of the Strategy. There is currently no detailed baseline of biodiversity in Scotland against which biodiversity gains (and losses) can be measured. It is equally not clear from the Strategy what constitutes success as the goals are often undefined – how do we know when we have succeeded in achieving the vision? Once we understand the baseline, and we understand the target, how do we ensure that all involved are all measuring success in a consistent manner?

Developing a Scotland-wide biodiversity metric, similar to that in use in other part of the UK, would ensure a consistent and measurable approach, and whilst not applicable to all areas of the strategy would give a solid starting position. The obvious place to trial the metric would be in recording the delivery of NPF4 policies that relate to biodiversity enhancements.

5 Conditions for Success

Question: Have we captured the key enabling factors which are essential in order for our strategy to be successful?

Council response: That the current Strategy recognises and learns from the failings of the previous strategy is a positive starting position and we support the Conditions of Success and full range of Proposed Outcomes.

Governance Structures and Accountability

We agree that it is essential to mainstream biodiversity values into policies, regulations, planning and development processes at all levels of government. We particularly welcome the review of the legislative framework to ensure it is fit for purpose to deliver the Strategy; if the Strategy is to be delivered it must be supported by new or improved legislation - halting and reversing biodiversity decline should be requirement, not an option. It is presumed that the forthcoming Natural Environment Bill will provide greater clarity on this issue, detail the roles/responsibilities of stakeholders and the statutory duties/powers that will be available to ensure the milestones of the strategy can be delivered.

This section references the addition of statutory targets but gives no additional detail and it is therefore difficult at this stage to judge any potential resource implications for the Council. If targets are introduced, it would seem logical to align biodiversity reporting and targets with those required for climate change. Again, it is presumed that more detail on this will be outlined once more detailed discussions on the Natural Environment Bill begin with stakeholders.

It is important that the Strategy is supported by properly resourced and skilled staff, which many government organisations currently lack. This is a major constraint and a barrier to achieving biodiversity gains and enhancements across large organisations and results in no/minimal gains in areas where they have influence. Given the urgency of the crisis, Scottish Government should consider making it mandatory for public bodies to have access to specialist biodiversity advice to help ensure biodiversity is mainstreamed in decision making and that the Strategy can be delivered.

The introduction of an independent body to monitor and report on progress is welcome. What powers will this body have, and will there be consequences for slippage or not meeting milestones and outcomes? It is positive to have targets, milestones and goals but these should be incentivised across all sectors, with sanctions should targets not be met.

Funding

The acknowledgement of the importance of funding is welcome and current funding streams are noted. However, if the strategy is to be delivered in its entirety and within the timescales outlined – and if Local Authorities are expected to play a pivotal role in its delivery – it is likely that Government funding will need to be increased to reflect any additional resource required.

Public engagement and Communications

Public engagement is an important element, and the Strategy will be difficult to deliver without the support of the public and local communities. A participatory and inclusive 'whole of society' approach is welcome, and with appropriate resourcing Councils would be in a position to play a central role in promoting and implementing the Strategy within its local communities and through key services (including schools, amenity services, planning, housing, social care etc.). Currently this resourcing is not available, and this risks significantly lessening the ability of Local Authorities to contribute to the successful deliver the Strategy's aims, milestones and outcomes.

Whilst we support the intention to provide regular and high-quality outdoor learning in and about nature for 3-18 years, we would suggest that older people would also benefit from such an initiative. Given that we need to act now to address biodiversity loss, it seems sensible to also target older generations that have a more immediate impact on the environment to increase their climate-nature literacy and engender positive behaviours.

We are pleased to see the crucial role that local communities and the diverse range of special interest groups involved in biodiversity recognised within the Strategy. However, without adequate resources for the organisations that support these groups to deliver this change (NatureScot, Forestry Land Scotland, Local Authorities etc) the role of communities may be marginalised.

Finally, a key enabling factor is access to a skilled workforce that can deliver the projects and enhancements on the ground. This requires a wide range of skills currently difficult to come by, certainly in more rural areas, including digger drivers (to deliver peatland restoration schemes), foresters, ecologists and so on.

Furthermore, there is a lack of materials from timber to saplings and it can be difficult to deliver projects on time and to budget when such fundamental components are difficult to acquire. An additional condition for success must be accessibility of skilled labour and accessibility of materials.