

Land Use and Biodiversity Team,
The Scottish Government,
1C-North Victoria Quay,
Edinburgh,
EH6 6QQ

LandUseStrategy@gov.scot

28 January 2016

Dear Sir / Madam,

Getting the best from our land: Consultation on a Draft Land Use Strategy for Scotland 2016-2021¹

Thank you for the opportunity to comment on this draft guidance note.

The Chartered Institute for Archaeologists

The Chartered Institute for Archaeologists (ClfA) is the leading professional body representing archaeologists working in the UK and overseas. We promote high professional standards and strong ethics in archaeological practice, to maximise the benefits that archaeologists bring to society, and provide a self-regulatory quality assurance framework for the sector and those it serves.

ClfA has over 3,200 members and more than 70 registered practices across the United Kingdom. Its members work in all branches of the discipline: heritage management, planning advice, excavation, finds and environmental study, buildings recording, underwater and aerial archaeology, museums, conservation, survey, research and development, teaching and liaison with the community, industry and the commercial and financial sectors.

ClfA's Scottish Group has over 250 members practising in the public, private and voluntary sector in Scotland. Furthermore, ClfA is a member of the Built Environment Forum Scotland (BEFS), a network organisation that brings together non-governmental organisations and professional bodies that work with Scotland's built environment.

A Draft Land Use Strategy for Scotland 2016-2021

Question 1a: Do you think that the Vision, Principles for Sustainable Land Use and three long term Objectives are still fit for purpose?

1.1 Yes, save that the management and protection of the historic environment is not sufficiently integrated into the principles and objectives. ClfA does not object to an

ecosystems approach, but it needs to be clearly explained how such an approach encompasses the management and protection of the historic environment.

1.2 At present this is a land use strategy for the natural environment and not for the whole of the environment (which includes the historic environment). To address this, the Objectives should specifically refer to the historic environment and not just to 'nature' and 'natural resources'.

Question 1b: Please provide your reasons for your answer.

1.3 See above.

Question 2a: Do you agree that continued use of an ecosystems approach is an effective way to manage Scotland's natural capital?

2.1 It is an effective way to manage Scotland's natural capital, but the draft Land Use Strategy does not make clear how an ecosystems approach can facilitate the effective management of Scotland's cultural capital in the form of its historic environment.

Question 2b: Please provide reasons for your answer.

2.2 See above.

Question 3a: Is the relationship as set out in the draft Land Use Strategy 2016 – 2021 clear?

3.1 Yes, save that

(1) the Scottish Archaeology Strategy should be identified in the table on page 14 and generally in the document. The table helpfully identifies valuing and enjoying our built and natural environment and protecting it and enhancing it for future generations as a relevant Scottish Government Outcome and identifies Our Place in Time – The Historic Environment Strategy for Scotland as a relevant document, but there is no mention of the Scottish Archaeology Strategy or the historic environment here or anywhere else in the draft

(2) it would be helpful further to clarify the relationship with planning policy, for instance as to which documents take precedence in the event of inconsistency.

Question 3b: Do you have any comments on the relationship between the LUS and Scotland's Economic Strategy 2015, National Planning Framework, National Marine Plan and other relevant policies?

3.2 See above.

Question 4a: Do you think that the activities described above could be useful?

4.1 Yes.

Question 4b: Do you have any suggestions on other kinds of information and activities that could be useful?

4.2 Information as regards how an ecosystems approach fully embraces and takes account of the historic environment would be useful.

Question 5: How could the content of the current Scottish Forestry Strategy be updated to better reflect the Objectives and Principles of the Land Use Strategy and other key priorities?

5.1 The content could be revised further to reflect the importance of the historic environment in forestry management. In fairness, the current Forestry Strategy identifies and addresses 'contributing to Scotland's diverse and attractive landscapes' and 'helping to manage Scotland's historic environment and its interpretation and enjoyment' within the purposes of key theme 6, 'Environmental quality' – a recognition which is currently lacking in the draft revised Land Use Strategy.

Question 6a: Do you consider that there could be advantages in having a single policy statement about land which deals with ownership, use and management?

6.1 Yes, but care needs to be taken to differentiate between the rights, obligations and aspirations of owners and the rights, obligations and considerations under planning law (which are not necessarily related to ownership).

Question 6b: Do you have any comments on the relationship between current land related policies and how these would relate to a single policy statement?

6.2 See above.

Question 7a: Do you agree that models and GIS tools could help inform decision making about land use/management change?

7.1 Yes.

Question 7b: Please provide your reasons for your answer.

7.2 Historic Environment Records (HERs) embodying GIS tools already help to inform land use / management change, although no mention of them is made in the draft.

Question 7c: Do you think that a baseline ecosystems services mapping tool could be useful?

7.3 Yes, but it should incorporate information on the historic environment already on HERs.

Question 7d: Do you have any comments on a mapping tool?

7.4 No comment.

Question 8a: Do you agree that regional land use partnerships could be a helpful way to support regional delivery of the Land Use Strategy?

8.1 Yes.

Question 8b: Who do you think could be best placed to lead these initiatives?

8.2 Local authorities, but only if they are provided with adequate resources to undertake this role.

Question 8c: Can you suggest any alternative means of supporting the delivery of the Land Use Strategy at regional level?

8.3 No comment.

Question 8d: Do you have any other comments on this policy?

8.4 No comment.

Question 9a: Do you think that regional land use frameworks could be useful to inform regional/local land use decision-making?

9.1 Yes.

Question 9b: Which aspects of this approach do you think require further development?

9.2 No comment.

Question 9c: Do you have any comments on this proposal?

9.3 No comment.

Question 10a: Do you think that land use mediation or facilitation could be useful in a land use context?

10.1 Yes.

Question 10b: Please provide your reasons for your answer.

10.2 Any mechanism which serves to enhance understanding of the issues by stakeholders and the public is likely to be beneficial.

Question 11: Do you have any suggestions on other potential measures to encourage climate friendly farming and crofting?

11.1 No comment.

Question 12a: Do you agree that more localised map-based ecosystems assessments could be useful to assist in informing funding decisions?

12.1 ClfA is concerned to see how ecosystems assessments would usefully assist funding decisions relating to the historic environment.

Question 12b: Please provide your reasons for your answer.

12.2 No comment.

Question 13a: Do you agree that an assessment of ecosystems health and a spatial approach could be helpful to further inform targeting for the next SRDP?

13.1 Yes, but ClfA is not convinced that such assessments would capture all relevant information relating to the historic environment and would wish to see targeting for the next SRDP informed by adequate information relating to the historic as well as the natural environment.

Question 13b: Please provide your reasons for your answer.

13.2 See above.

Question 14a: Do you agree that an urban pilot project could be useful?

14.1 Yes.

Question 14b: Please provide your reasons for your answer.

14.2 Such a pilot could, amongst other things, address issues relating to the historic environment.

Question 15a: Do you think that a strategic vision could be useful for the uplands?

15.1 Yes, provided that this recognised and addressed the historic environment.

Question 15b: Do you have any comments on this proposal?

15.2 See above.

Question 16a: Do you agree that the Land Use Strategy indicators are still fit for purpose?

16.1 No. They have only peripheral relevance to the historic environment.

Question 16b: Do you have any comments on the future monitoring of the revised Land Use Strategy?

16.2 No comment.

Question 17: Are there any other activities that you think we should be undertaking to achieve better understanding and application of the Principles or delivery of the Strategy?

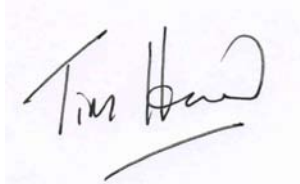
17.1 Only those suggested above.

Question 18: Are there any other points you wish to make about any aspect of this draft Strategy?

18.1 No.

If there is anything further that I can do to assist please do not hesitate to contact me.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Tim Howard', with a horizontal line underneath.

Tim Howard LLB, Dip Prof Arch
Senior Policy Advisor

¹ <https://consult.scotland.gov.uk/land-use-and-biodiversity/land-use-strategy-for-scotland>