

HOPS Response to the Scottish Biodiversity Strategy Consultation (12th September 2022)

Information Note

Heads of Planning Scotland (HOPS) is the representative organisation for senior planning officers from Scotland's local authorities, national park authorities and strategic development planning authorities.

The purpose of HOPS is to:

- Promote the profile of public sector land use planning
- Support and promote excellence in planning leadership
- Ensure the delivery of a culture of continuous improvement in planning authorities
- Provide advocacy and coordination to ensure that planning authorities are properly resourced to deliver quality outcomes.

This consultation response covers general points raised by planning authorities we note however there may be local issues and information raised within individual local authority responses.

HOPS would like to thank planning authorities for their contribution to this consultation response.

The evidence of biodiversity loss

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

HOPS agree that there is a nature/biodiversity crisis in Scotland.

Information prepared for the Scottish Parliament by SPICe in relation to COP-15¹ and the State of Nature Report by NatureScot², detail the global and Scottish context of the nature crisis. We have no evidence to dispute the claims in these documents.

Clarity and consistency are needed when referring to the terms "nature crisis" and "biodiversity crisis" within this document and other Scottish Government documents.

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

¹ <https://digitalpublications.parliament.scot/ResearchBriefings/Report/2021/10/11/b90a3f7c-ad7c-4bd1-a16e-432f17d72ece#>

² <https://www.nature.scot/doc/state-nature-scotland-report-2019>

Challenges:

The nature/biodiversity crisis should be given the same standing as the climate crisis. There are clear links between both crisis but the nature/biodiversity crisis does not receive as much emphasis. Having no set targets for the nature/biodiversity crisis means it may not be as prioritised as it should be. General awareness of the nature/biodiversity crisis needs to be improved for officers, elected members and the general public. The nature/biodiversity crisis is also a multi-disciplinary issue which needs to be addressed by a collaborative approach. From a planning authority perspective, we would like to see more joined up working at all levels. We note effective funding and long-term investment will play a major role in implementing improvements.

In land use terms we note the following items (this is not however an exhaustive list):

- Pressures on land use change, particularly for housing in green field sites
- Agriculture practice
- Habitat fragmentation
- The incorrect introduction of species to habitats in climate change mitigation measures, noted particularly in tree planting

Opportunities:

Effective land use planning can be a potential lever for positive change. There are knock on positive effects of nature-based solutions and general good land use, local authorities are already showing good practice and we would defer to their examples on this matter.

There are currently few references to the planning system throughout. A well-resourced planning system supported by clear standards and targets set out within the National Planning Framework 4 would have a positive effect on the nature/biodiversity crisis.

Our strategic vision – framing and context

3. Is the draft vision clear enough?

No

The aims within the vision are welcomed, however the wording may be too vague to support the overall goals. Targets or outcomes need to be included to provide stakeholders a clearer understanding of what is intended to be achieved.

4. Is the draft vision ambitious enough?

No

We note:

- A focus on restoration which would be difficult to assess

- Missed opportunities to note protection and expansion of current sites, which may have more positive long-term effects
- A lack of defined targets

5. Do you have any suggestions for a short strategic vision which would form the title for the strategy?

No

How will we know when we have succeeded?

- **Scotland's Rural Environment – Farmland, Woodlands and Forestry, Soils and Uplands**
- **Marine environment**
- **Freshwater environment: rivers lochs and wetlands**
- **Coastal environments**
- **Urban environments – towns and cities**
- **Across our land and at sea – overall health, resilience and connectivity**

HOPS would defer to the expertise of local authority staff on the questions set out for the noted environments.

From the evidence presented to us we would note the following general comments.

Outcomes statements in general do not adequately capture the change required. As stressed before associated targets would assist these outcomes being reached.

Clarity is required in the terminology used throughout.

The conditions for success

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

Yes, in part.

Targets including requirements for monitoring and associated data collection will be key to making the strategy successful.

Expected resources required including funding streams would assist in our understanding if the strategy can be effectively implemented. We note previous under-resourcing of the biodiversity conservation.

The biodiversity/nature crisis needs to be embedded in all related Government strategies. Clear links should be presented between these.

39. Are there good examples of enabling conditions in other strategies we could learn from?

NPF4 provides many enabling conditions, but again, lacks goals and targets to actually force the necessary change to ensure deliverability of any of these strategies.

40. Can you set out how you think any of the proposals set out in the consultation might help to eliminate discrimination, advance equality of opportunity and foster good relations?

Clear communications and expectations will be key to helping deliver the goals in the strategy.