

Consultation on SNH Draft Corporate Strategy 2008- Summary of responses

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INTRODUCTION

Scottish Natural Heritage is a non-departmental public body (NDPB) responsible through Ministers to the Scottish Parliament. SNH's remit is to promote the care and improvement, responsible enjoyment, greater understanding and appreciation and sustainable use of the natural heritage, now and for future generations.

SNH's last Corporate Strategy was published in 2003 and formed the basis for the current Corporate Plan, which expired in March 2008. The Corporate Strategy needs to be renewed to reflect changes in the strategic direction for SNH including the wider public policy agenda. The new Corporate Strategy sets out the strategic priorities for Scottish Natural Heritage (SNH) and the priority actions to deliver them over the next 5 years or more. The Corporate Plan sets out a more detailed Plan for the period 2008-2011, starting with these priorities but also include detailed actions with associated resource allocations.

The draft Corporate Strategy was issued for public consultation on 25th January 2008 and the consultation closed on 24th March 2008. This report provides a summary of responses received.

At the same time, an Environmental Report was available for public consultation, as required by the Environmental Assessment (Scotland) Act 2005. The report outlined the potential environmental effects of the Corporate Strategy and associated Corporate Plan. A Statement of Adoption is being prepared and will be published at the same time as the Corporate Strategy.

The draft Corporate Strategy issued for consultation and the Environmental Report are still available via the SNH website at: <http://www.snh.org.uk/strategy/pd00.htm>.

Further information can be obtained from:

Mary Christie
Battleby, Redgorton, Perth, PH1 3EW
Email: strategy@snh.gov.uk
Tel: 01738 458657

SUMMARY OF RESPONSES RECEIVED

The draft Corporate Strategy was placed on the SNH website, and an invitation to comment was sent electronically to 255 organisations. In addition flyers inviting comment were made available at SNH's main offices. In fulfilment of the requirements of the Strategic Environmental Assessment legislation, a public notice about the consultation was placed in the Scotsman.

Of the 255 organisations invited to comment, responses were received from 29. In addition comments were received from one other organisation, from five individuals, and on an informal basis from two Government organisations, making a total of 36 responses to the consultation.

Most, but not all, of the responses were supportive of the draft Strategy, its overall structure, outcomes and actions. Comments reflected on SNH's aims and objectives, and on the proposed actions, with additional actions proposed by some. There were also suggestions for alternative wording. The following analysis summarises the comments received.

Presentation and structure

Several organisations complimented the draft Strategy on its clarity in terms of aims, outcomes and actions, and its succinct style. Some respondents felt that the cover photograph did not adequately reflect SNH's remit.

General comments

Several government organisations, local authorities and some individuals expressed support for the overall messages of the draft Strategy, particularly the links to the Government agenda. Support was also expressed by the National Trust for Scotland for linking the environmental agenda with national objectives, and by the Mountaineering Council of Scotland for the demonstration that Scotland, its natural heritage, people and government are part of the same agenda and stronger together.

Some other third sector bodies and some individuals had concerns about aligning the draft Strategy with government objectives more closely than in previous SNH strategies. While they recognised the benefits, some organisations highlighted the risk to SNH downplaying its role as an independent advisor to government. Some highlighted the potential for government pressure to bear unduly on management decisions. Others felt that SNH risks alienating the public if it overly relates the need to protect the natural heritage to the potential benefits to the economy which might result.

Two respondents noted a difference in emphasis with previous Strategies, suggesting it was less strongly founded on the principles of sustainable development, and that natural heritage was being viewed as subsidiary to economic growth. Another felt that SNH should explore how different models of sustainable

economic growth (in the environmental and social sense) can be achieved rather than simply furthering and supporting conventional models of economic growth.

Several respondents wanted greater clarity on the timescale of the Strategy.

A number of respondents noted that the Actions in the draft Strategy are very strategic, lack targets or measures of success or an indication of how they will be achieved and with what resources. Some found the reference to national outcomes, targets and indicators confusing.

Introduction, context and 'Our Priorities'

Suggestions for additions to the Introduction included the need to make clear that the natural heritage encompasses areas of rural land use and greenspace in urban settings, not just wild and natural areas, and for the Strategy to aim to create a wide consensus around key issues so reinforcing regulatory activities. One local authority suggested an additional purpose of working towards consistency between the policies and objectives of SNH and those of other government agencies. One individual wanted to see the list of SNH's roles including conservation of the natural heritage, and also funding others to do so.

Respondents made several suggestions for topics that should be included in the Context, including the importance of Scotland's competitive advantage, the European Landscape Convention, the need for a robust environment to maintain future options, and the growth in the social economy.

While one third sector organisation welcomed the reference to the Natural Heritage Futures documents and hoped that these would continue to guide SNH's approach, another organisation questioned whether these are still fresh and understood by others outside SNH.

Several respondents found the diagram on page 5 helpful. However one local authority thought that it indicated that actions towards protecting the natural heritage are shown as subsidiary to economic growth.

Caring for Nature Priority

Respondents generally supported the outcomes and actions under this Priority, with most agreeing that this is a key part of SNH's remit. However some felt that achieving the outcomes relating to 2010 is unrealistic. Some said that targets beyond this date should be set; others commented that halting biodiversity loss is not possible given the likely effects of climate change, and also the continued pressure from development and agriculture on lowland habitats. Several respondents expressed concern that the draft Strategy does not reflect a general need to afford some protection for habitats and species outwith designated sites.

One local authority felt that it would be helpful if SNH produced guidance that demonstrated whether Scotland is meeting the biodiversity duty in the Nature Conservation (Scotland) Act and if not where it is failing. An individual respondent felt that the Scottish Biodiversity Strategy could give only a national steer and that

the local knowledge of local SNH staff was very important in achieving biodiversity aims.

Several respondents, including a Government organisation and a voluntary conservation body, wanted to see grazing issues addressed, including the need for more riparian woodland along upland water courses. Others, including the Association of Deer Management Groups, wanted to see specific mention of deer issues.

Some respondents flagged that the Strategy does not say enough about SNH's role in environmental and sustainability education, nor link sufficiently with the Curriculum for Excellence.

Other suggestions for additional issues to include were Local Nature Reserves, urban wildlife, the Water Framework Directive, biodiversity data collection and dissemination, updating the Ancient Woodland Inventory, woodland creation targets, wildlife crime, non-native species, the Species Action Framework, and the UK Biodiversity Action Plan.

One local authority raised two concerns about resourcing of priorities that SNH's Corporate Plan should address – whether SNH has the resources both to undertake management on statutory sites and also adequately support schemes to improve general ecosystems and biodiversity, and that the task of identifying EU marine sites could dilute funds for management of inland sites.

There were two comments about the national indicator on breeding birds – one that it is potentially misleading and one that it is not wide enough in scope for monitoring trends in biodiversity.

Responding to Climate Change

There was general support for SNH including climate change as a strategic priority. One respondent felt that the text should include more factual information on likely changes.

Some additions to SNH's action were suggested including for SNH to support sustainable modes of transport and for SNH to be involved in raising awareness of how individuals can reduce their carbon footprint and in education in schools about climate change.

Some respondents wanted to see SNH leading action to support biodiversity adaptation, including conservation, creation and restoration of habitats at a landscape scale and increasing the permeability of the Central Belt for species dispersal. One organisation felt the draft Corporate Strategy should include an ambition to develop an adaptation strategy for Scotland's biodiversity – more than simply reviewing existing conservation targets and developing habitat networks. Others felt that a review of conservation targets in the light of climate change was particularly important. The RSPB felt that there was too much emphasis on reviewing biodiversity targets and the role of designated sites, and too little

recognition of their contribution to habitat and species resilience through informing land-use planning.

One respondent wanted to see greater commitment to encouraging soil management measures aimed at conserving carbon.

Several respondents, including individuals, local authorities and third sector bodies, commented that the text does not adequately express the tension between renewable energy as a benefit to addressing climate change, and renewable energy as a form of development with very significant impact on landscapes and habitats.

The Woodland Trust Scotland looked to SNH to support minimum standards and certification of greenhouse gas savings and environmental impacts for bio energy production.

One local authority was concerned that the draft Strategy has no targets for improving SNH's operational management in terms of carbon emissions.

Another local authority supported further survey work to underpin monitoring of effects of climate change on biodiversity, with baseline surveys possibly funded through the Scotland Rural Development Programme.

Delivering Health and Well-being

There was general support for SNH to make the links between its remit and the health and well-being agenda, though some expressed a risk that this wide focus might mean that SNH's work on recreation issues was reduced. Some wanted to see the links widened to include the contribution of SNH's work in protecting the natural environment particularly to mental well-being, in terms of improved local environments. One individual respondent felt that outdoor activity was going beyond SNH's remit which was more strictly about the enjoyment of the natural heritage.

The Central Scotland Forest Trust wanted to see more recognition in the Strategy of the spatial concentration of deprivation and ill-health.

Several respondents agreed that links to sustainable transport were important, including public transport access to greenspace, although one individual thought SNH should focus on sustainable travel by tourists and visitors rather than by residents.

Two respondents mentioned the need to recognise the potential for impacts from outdoor recreation – on biodiversity interests and on drinking water quality. Another, the Mountaineering Council for Scotland, wanted responsibility towards the natural world and other users to be integrated into efforts to increase participation.

The Woodland Trust Scotland sought an action to encourage implementation of the Space for People Woodland Access Standard, i.e. 55% of people in Scotland within 500m of a 2ha accessible wood and 97% within 4km of a 20ha accessible wood. An individual respondent felt that the Forestry Commission Scotland's initiatives in relation to communities and peri-urban areas should be mentioned.

There was wider concern, both from a Government organisation and some third sector organisations, that landscapes were not sufficiently highlighted in the Strategy given that care for landscape is part of SNH's statutory remit. The NTS highlighted the importance of the quality of environments that we use day to day and the landscape agenda should not just be about the best areas, while the Mountaineering Council for Scotland looked for greater protection of landscapes outwith designated areas from renewable energy development. Several local authorities welcomed SNH's continuing commitment to National Scenic Areas. The NTS wanted to see greater emphasis on the cultural dimension of landscape.

While some respondents welcomed the aspiration to increase involvement by communities in managing the environment, another said this could be overplayed with many people not wanting, feeling the need, or having the capacity to get involved. One local authority felt that local communities would have limited impact, and that the rural economy would have a more significant influence on the landscape so that identifying and managing its impacts would be more important.

Two respondents highlighted the important role SNH should play in improving the quality of greenspace in urban environments through support for management and maintenance.

Supporting the Scottish Economy

There was a range of views on this Priority. Many supported SNH demonstrating the natural heritage's contribution to the economy, including Government organisations, local authorities and third sector bodies. Others were concerned that there was insufficient focus on achieving sustainable development. There were different views as to whether this Priority clarified or obscured SNH's decision-making in relation to development. Some felt that SNH should not be making judgments that involve balancing adverse impacts on the natural heritage against other benefits and felt that currently this process was not transparent. Others wanted greater clarity on how costs and benefits are measured.

Several local authorities commented on proposals not expressed in the draft Strategy, following the review of SNH's involvement with the planning system, with several expressing concern about the resource implications falling to them arising from SNH's withdrawal of advice in some areas.

Other suggested topics for inclusion included affordable housing and the need to develop ways to achieve tourism growth targets alongside reduced aviation growth, with one local authority highlighting the potential inconsistency between the Scottish Government's targets in respect of reducing greenhouse gas emissions and targets for tourism growth.

Two respondents were concerned with systems of land use. One voluntary conservation body looked for SNH to help achieve a long-term, single, integrated EU sustainable land management scheme, including strengthened conditions for the protection of habitats. Another respondent highlighted the need to find a land-use

support system for the future that goes with the grain of economic land use but supports land uses that underpin the natural heritage.

Delivering a high quality Public Service

Several local authorities expressed concern about the potential impact of transferring funding to local authorities, e.g. for ranger services and for partnerships such as local records centres and local biodiversity action partnerships. Several also highlighted the importance of SNH continuing to work with others, including through agreements with local authorities and through Community Planning. One voluntary body urged SNH not to distance itself from the voluntary sector involved in enjoyment of the natural heritage which without SNH support would be much weaker.

Several respondents wanted to see greater clarity about the Scottish Rural Service.

The Association of Deer Management Groups highlighted the importance of retaining skills if the Deer Commission Scotland is integrated into SNH.

Another organisation felt the Strategy needs to recognise the implications of new strategic priorities for the organisation, e.g. in developing skills to address social and economic issues.

The RSPB was anxious that SNH retain the budget and capacity to monitor the state of the natural heritage. The Scottish Government Rural and Environment Research and Analysis Directorate highlighted the need for SNH to work with others in gathering, analysing and implementing the knowledge and understanding needed to underpin SNH's corporate objectives.

NEXT STAGE

We have made a substantial number of changes to the draft Strategy in response to the consultation responses, including inclusion of reference to some of the additional issues highlighted by consultees as important, and additions of new Actions which we agreed were significant omissions. Several comments were more relevant to the new Corporate Plan and are being considered in its preparation. Others reflect issues that are too detailed for the Strategy and are more appropriate for SNH's policy statements or action plans such as that being developed for Climate Change. A few requests for further discussion on specific issues are being taken forward through direct contact with the respondent by the appropriate person in SNH.

We intend to publish the new Corporate Strategy in July 2008 and will notify all respondents to the consultation as well as the original list of consultees at this time.

Appendix 1: List of respondents

Aberdeenshire Council
Anonymous individual
Association of Deer Management Groups
British Energy
British Trust for Ornithology Scotland
KJ Butler
Community Woodlands Association
Dr Jane Cooper
Dumfries and Galloway Council
East Ayrshire Council
East Dunbartonshire Council
Tom Hart
Healthy Environment Network
Highlands and Islands Enterprise
Historic Scotland
Mountaineering Council of Scotland
Museums Galleries Scotland
National Biodiversity Network
National Trust for Scotland
Natural England
D. N. Ogilvie
Prof Paul Racey, University of Aberdeen
Royal Society for the Protection of Birds Scotland
Scotland's Moorland Forum
Scottish Agricultural College
Scottish Enterprise
Scottish Government Rural and Environment Research and Analysis Directorate
Scottish Government Rural Payments and Inspections Directorate
Scottish Rights of Way and Access Society
Scottish Rural Property and Business Association
Scottish Water
South Lanarkshire Council
The Highland Council
Woodland Trust Scotland
Informal comment (Scottish Government Schools Directorate)
Informal comment (Forestry Commission Scotland)

Appendix 2: List of consultees

Aberdeen City Council
Aberdeenshire Council
Age Concern Scotland
Angus Council
Architecture and Design Scotland
Argyll & Bute Council
Associated British Ports
Association for the Protection of Rural Scotland
Association of Deer Management Groups
Association of Salmon Fishery Boards
Association of Scottish Community Councils
Association of Scottish Shellfish Growers
Association of Scottish Stillwater Fisheries
Atlantic Frontier Environmental Network
Atlantic Salmon Trust
Ayrshire Joint Structure Plan & Transportation Committee
BEMIS
Big Lottery Fund
Black Environment Network
Black Environment Network
Botanical Society of the British Isles (Scotland)
British Association for Shooting and Conservation
British Crop Protection Council
British Energy plc
British Geological Society
British Horse Society
British Marine Finfish Association
British Nuclear Fuels Limited
British Ports Association
British Trout Association
British Trust for Conservation Volunteers
British Trust for Ornithology
British Waterways
British Wind Energy Association
Butterfly Conservation
Cairngorms National Park Authority
Central Scotland Forest Trust
Centre for Ecology and Hydrology
Centre for Ecology and Hydrology - Bush
Chartered Institution of Water and Environmental Management Scotland
City of Edinburgh Council
Clackmannanshire Council
Comhairle nan Eilean Siar

Communities Scotland
Community Woodlands Association
Confederation of British Industry (Scotland)
Confederation of Forest Industries (UK) Ltd
Convention of Scottish Local Authorities
Countryside Council for Wales
Crofters Commission
Crop Protection Association
Deer Commission for Scotland
DG Environment
DoE NI Environment & Heritage Service
Dumfries & Galloway Council
Dundee City Council
East Ayrshire Council
East Dunbartonshire Council
East Lothian Council
East Renfrewshire Council
Edinburgh College of Art
Equality and Human Rights Commission
European Commission Representation in Scotland
Falkirk Council
Fieldfare Trust
Fife Council
Fisheries Research Services
Fishermen's Association Ltd
Forest Enterprise Scotland
Forestry Commission Scotland
Forth Ports plc
Forward Scotland
Friends of the Earth Scotland
FWAG Scotland
Game Conservancy Trust
Garden History Society Scotland
Gay Birders Club
Glasgow & the Clyde Valley Structure Plan Joint Committee
Glasgow City Council
Green Space
Greenspace Scotland
Health Scotland
Heriot Watt University
Heritage Lottery Fund
Highland Birchwoods
Highland Council
Highlands and Islands Community Energy Company
Highlands and Islands Enterprise
Historic Scotland

Homes for Scotland
Institute of Chartered Foresters
Institute of Civil Engineers
Institute of Ecology and Environmental Management
Institute of Fisheries Management
Inverclyde Council
John Muir Trust
Joint Nature Conservation Committee
Keep Scotland Beautiful
Landscape Institute (Scotland)
Lantra National Training Organisation Ltd
Linking Environment and Farming (LEAF)
Loch Lomond and The Trossachs National Park Authority
Macaulay Institute
Marine Conservation Society
Maritime & Coastguard Agency
Midlothian Council
Moray Council
Mountaineering Council of Scotland
Napier University
National Biodiversity Network
National Farmers Union of Scotland
National Museum of Scotland
National Trust for Scotland
National Wind Power Ltd
Natural England
North Ayrshire Council
North Lanarkshire
Northern Lighthouse Board
Office of the Scottish Information Commissioner
Orkney Island Council
Paths For All Partnership
Perth & Kinross Council
Plantlife
Police Wildlife Liaison Officers
Quarry Products Association
Ramblers Association Scotland
Reforestation Scotland
Renfrewshire Council
River and Fisheries Trust of Scotland
Royal Botanic Garden Edinburgh
Royal Highland Education Trust
Royal Incorporation of Architects in Scotland
Royal Institute of Architects in Scotland
Royal Institution of Chartered Surveyors
Royal Scottish Forestry Society

Royal Scottish Geographical Society
Royal Society of Edinburgh
Royal Town Planning Institute
Royal Yachting Association
RSPB Scotland
Salmon and Trout Association
Scottish & Southern Energy
Scottish Agricultural College
Scottish and Southern Energy
Scottish Arts Council
Scottish Association for Country Sports
Scottish Association for Marine Science
Scottish Association for Public Transport
Scottish Borders Council
Scottish Business in the Community
Scottish Canoe Association
Scottish Civic Forum
Scottish Coastal Forum
Scottish Council Development & Industry
Scottish Council for Voluntary Organisations
Scottish Countryside Activities Council
Scottish Countryside Rangers Association
Scottish Crofting Foundation
Scottish Energy and Environment Foundation
Scottish Enterprise
Scottish Environment Link
Scottish Environment Protection Agency
Scottish Federation for Coarse Angling
Scottish Federation of Housing Associations
Scottish Fisheries Co-ordination Centre
Scottish Fisheries Protection Agency
Scottish Fishermen's Federation
Scottish Gamekeepers Association
Scottish Golf Environment Group
Scottish Government Director General Environment
Scottish Government Communications Directorate
Scottish Government Strategy & Ministerial Support
Scottish Government Public Service Reform
Scottish Government Planning
Scottish Government Transport
Scottish Government Enterprise, Energy and Tourism
Scottish Government Schools
Scottish Government Lifelong Learning
Scottish Government Environment Directorate
Scottish Government Public Health & Well-being
Scottish Government Housing and Regeneration

Scottish Government Marine Directorate
Scottish Government Rural Payments and Inspections Directorate
Scottish Government Rural and Environment Research & Analysis
Scottish Government Rural Directorate
Scottish Government Ecological Advice
Scottish Greenbelt Foundation
Scottish Historic Buildings Trust
Scottish Museums Council
Scottish Native Woods
Scottish Parliament Information Centre
Scottish Police Federation
Scottish Power
Scottish Raptor Study Groups
Scottish Renewables Forum
Scottish Rights of Way and Access Society
Scottish Rural Property & Business Association (SRPBA)
Scottish Salmon Producers Association
Scottish Society for the Directors of Planning (SSDP)
Scottish Sports Association
Scottish Tourism Forum
Scottish Transport Studies Group
Scottish Water
Scottish Wild Land Group
Scottish Wildlife Trust
Scottish Woodlands Limited
SDEF
Sea Fish Industry Authority
Sea Mammal Research Unit
Shetland Salmon Farmers' Association
Shetlands Island Council
Soil Association Scotland
South Ayrshire Council
South Lanarkshire Council
Southern Uplands Partnership
Sportscotland
Stirling Council Development
Sustainable Development Commission Scotland
Sustainable Scotland Network
Sustrans Scotland
The Army
The British Deer Society
The Crown Estate
The Grayling Society
The Heather Trust
The Mammal Society
The Navy

The People's Trust for Endangered Species
The Scottish Civic Trust
The Scottish Ornithologists' Club
The Woodland Trust Scotland
Transco
Tree Council
University of Aberdeen
University of Dundee
University of Edinburgh
University of Glasgow
University of Paisley
University of Stirling
University of the Highlands and Islands
Vincent Wildlife Trust
Visitscotland
Walking Women
Water UK
Waterways Trust Scotland
West Dunbartonshire Council
West Lothian Council
West Sutherland Fisheries Trust
Western Isles Fishermen's Association
Whale and Dolphin Conservation Society
Wildfowl & Wetlands Trust
WWF Scotland