

# Scottish Wildlife Trust

Environment, Climate Change and Land Reform Committee  
Call for Evidence - *Scottish Government's Draft Budget 2017-18*



The Scottish Wildlife Trust welcomes the opportunity to submit evidence to the Environment, Climate Change and Land Reform Committee which focuses on how Scottish Environment Protection Agency (SEPA), Scottish Natural Heritage (SNH) and Marine Scotland (MS) have contributed to the Scottish Government's national objectives in Scotland Performs<sup>1</sup>. The Committee has requested that evidence centres on: whether the success of meeting these objectives may have been affected by a declining budget; challenges faced in maintaining existing functions; and the need to respond to changing priorities. The Trust has responded broadly within this framework.

## Background

The Trust believes the Scottish Government's ambition to: *create a more successful country, with opportunities for all of Scotland to flourish* is inextricably linked to a healthy natural environment. A key reference point in relation to how Scotland's natural capital<sup>2</sup> is faring is the Natural Capital Asset Index,<sup>3</sup> which provides an overview of the state of Scotland's natural assets, assessing the quality and quantity of habitats in Scotland, as well as their potential to deliver different ecosystem services.<sup>4</sup>

Between the 1950s and 1990s Scotland's natural capital declined. Since 1990 there has been a slight recovery, with freshwaters, woodland, coast and urban greenspace showing the greatest improvement *although levels are still well below the baseline years*. Upland habitats and agricultural habitats are still in decline.<sup>5</sup>

The Trust has identified **eight key systemic threats** to Scotland's biodiversity and until there is more coordinated action amongst government Directorates, agencies and public bodies – in line with their Biodiversity Duty<sup>6</sup> - to address them, the Scottish Government's ambitions under Scotland Performs will be severely hampered.

The eight key threats are:

1. Habitat fragmentation and land use compartmentalisation
2. Overgrazing, particularly by deer
3. Diffuse pollution
4. Poorly located and designed development
5. Invasive, non-native species (INNS)
6. Mismanagement of marine resources
7. Unsustainable land use practices, particularly intensive monocultures
8. Climate change

The Trust's evidence mainly focuses on the work of SNH, but we have also provided commentary on SEPA's and MS's resources and effectiveness in delivering outcomes and addressing systemic threats. We conclude with what we believe is the most effective way forward to deliver national outcomes, which involves a more coordinated approach across agencies and government to tackle the eight key threats to achieving healthy ecosystems across Scotland's land and seas.

Key priorities for SNH, SEPA and MS in relation to the Scottish Government's national outcomes (NO) are stated in their Corporate Plans, namely:

1. We live in a Scotland that is the most attractive place for doing business in Europe (SNH, SEPA, MS)

2. We realise our full economic potential with more and better employment opportunities for our people (MS)
6. We live longer, healthier lives (SNH, SEPA, MS)
7. We live our lives safe from crime, disorder and danger (SEPA)
10. We live in well-designed, sustainable places where we are able to access the amenities and services we need. (SNH, SEPA, MS)
11. We have strong, resilient and supportive communities where people take responsibility for their own actions and how they affect others. (SNH, SEPA, MS)
12. We value and enjoy our built and natural environment and protect it and enhance it for future generations (SNH, SEPA, MS)
13. We take pride in a strong, fair and inclusive national identity (SEPA)
14. We reduce the local and global environmental impact of our consumption and production (SNH, SEPA, MS)
16. Our public services are high quality, continually improving, efficient and responsive to local people's needs (SNH, SEPA, MS)

## Scottish Natural Heritage

In the last six years SNH's budget has declined by c. 18% from £66.733m in 2010/11 to £54.316m<sup>7</sup> between 20015/16.

Despite these budget cuts good progress on outcomes has been made in some areas, through a re-direction of resources and a strong drive to make processes more efficient. These include:

- **Re-directing and leveraging in new funds** for green infrastructure investment, especially in the Central Scotland Green Network area and through the Green Infrastructure Strategic Development Fund - which is, however, reliant on EU Structural Funds and so uncertain in the long term.
  - *Contributes to numbers 1, 2, 10 and 12*
  - *Addresses systemic threats 1 and 8*
- **Development of a suite of Marine Protected Areas**, marine baseline surveys and expansion of marine Special Protection Areas for seabirds plus the creation of a Special Area of Conservation for the harbour porpoise.
  - *Contributes to numbers 1 and 12*
  - *Addresses systemic threats 6 and 8*
- **Contributions to the creation of Scotland's National Marine Plan** and to development of the marine renewables sector.
  - *Contributes to numbers 1, 12 and 14*
  - *Addresses systemic threats 4 and 6*
- **Delivering peatland restoration (albeit on a comparatively small scale)** through the Peatland Challenge Action Fund (although the additional funding from Scottish Government ceased in 2016/17).
  - *Contributes to numbers 1 and 12*
  - *Addresses systemic threats 1, 2 and 8*
- **Continued commitment to species conservation projects**, including Freshwater Pearl Mussels, Scottish Wildcat Action and Saving Scotland's Red Squirrels.
  - *Contributes to number 12*
  - *Addresses systemic threats 3 and 5*
- **Enhanced communications**, using a range of media channels, which help raise awareness about the state and value of Scotland's nature.
  - *Contributes to numbers 1 and 12*
  - *Addresses all systemic threats by helping decision makers and the public to understand the value of natural capital*

The Scottish Wildlife Trust also welcomes the steps taken by SNH under a "preventative" spend agenda, especially in relation to tackling health inequalities through the development of Scotland's Natural Health Service, and tackling ecosystem degradation through the development of nature-based solutions<sup>8</sup>, natural capital approaches, and youth engagement.

However, the Trust believes that although work has been initiated in these areas, *the pace of development has been constrained by a lack of staff capacity and budget resource to contribute meaningfully to partnership projects.*

To fully embrace the 'preventative spend' agenda, the Trust believes that more effort needs to be made to re-direct funding from other Directorates<sup>9</sup>, such as Health and Social Care; the Economy (especially agriculture); and Learning and Justice, in order to support and indeed show leadership for these preventative spend approaches. Additional to the above, the downward pressure on SNH's overall budget over the period since 2011 has had significant impacts. (See also Scotland's Biodiversity: A Route Map – First Progress Report). The Trust is particularly concerned about:

- **Reduced funding for Protected Areas** both in terms of maintenance and enhancement of habitat condition and access infrastructure (including on National Nature Reserves).
  - *Impacting particularly on numbers 1, 6, 10, 12 and 14*
  - *Not addressing systemic threats 2,5 and 8*
- **Lack of leadership for, and practical demonstration of, some key components of the National Ecological Network**, as set out in the National Planning Framework 3 and Scotland's Biodiversity: A Route Map to 2020 (it is often reported that work is progressing through CSGN – however progress at a *national* level is lacking).
  - *Impacting particularly on numbers 1, 6, 10, 12 and 14*
  - *Not addressing systemic threats 1,2, 3, 4 and 8*
- **Lack of progress with the development and implementation of a suite of Ecosystem Health Indicators (EHIs)**, with which to measure improvements/deterioration in ecosystem health, and which should inform the development of nature-based solutions to a range of catchment scale problems.
  - *Impacting particularly on numbers 10, 12 and 14*
  - *Affects all systemic threats as EHIs could identify which systemic threats need to be tackled as a priority at the catchment scale*
- **Inadequate resources being made available to meet to the Aichi Restoration target of restoring 15% of degraded ecosystems by 2020**, especially in relation to restoration of peatlands, native woodlands and rivers (and their corridors).
  - *Impacting particularly on numbers 1, 6, 10, 12 and 14*
  - *Not sufficiently addressing systemic threats 1-8*
- **Inadequate resources being made available to tackle issues such as Invasive Non-Native Species** at the catchment scale.
  - *Impacting particularly on numbers 1, 2, 6, 10, 12 and 14*
  - *Not addressing systemic threat 5 and 8*
- **Lack of progress with the implementation of Scotland's Wild Deer: A National Approach**, especially in relation to the implementation of effective collaborative Deer Management Plans.
  - *Impacting particularly on numbers 1, 2, 7, 11, 12 and 16*
  - *Not addressing systemic threats 1, 2, 5 and 8*
- **Substantial levels of funding, which could otherwise be directed at biodiversity restoration, are being directed towards goose control when this is largely an agricultural issue** and should therefore be managed and funded as such. Broader investment is required in the resourcing of a Wildlife Management Service to help respond appropriately to adaptive management schemes.
  - *Impacting particularly on numbers 1 and 12*
  - *Results in fewer resources to address any of the systemic threats*
- **The change in policy, and associated reduction in staff capacity available, to respond to planning and development cases.** This is compounded by constraints at the local authority level and means that local nature conservation sites<sup>10</sup>, that make a valuable contribution to the quality of local environments, are often placed under threat and/or lost.
  - *Impacting particularly on numbers 1, 6, 10, 12, 14 and 16*
  - *Not addressing systemic threats 1, 4 and 8*

Scottish Environment Protection Agency (SEPA)

The Trust welcomes SEPA's new regulatory approach,<sup>11</sup> which prioritises those who have most impact on Scotland's environment, and we welcome targeted action such as the walking of priority catchments to address diffuse pollution<sup>12</sup> and the focus on flood risk management.

However the Trust believes SEPA could do more to:

- **Meet the requirements of the Nature Directives** in relation to water quality rather than simply meeting the Water Framework Directive standards (the requirements in *Natura* are more rigorous).
  - *Impacting particularly on numbers 1, 6, 10, 12, 14 and 16*
  - *Not addressing systemic threats 1, 4 and 8*
- **Show more leadership around nature-based solutions** to river restoration (i.e. not just having recourse to the traditional structural engineering solutions).
  - *Impacting particularly on numbers 1, 2, 10, 11, 12 and 16*
  - *Not addressing systemic threats 1, 3, 4 and 8*
- **Lead, co-ordinate and resource programmes to tackle Invasive Non Native Species (INNS)** at a catchment scale.
  - *Impacting particularly on numbers 1, 2, 7, 11, 12 and 16*
  - *Not addressing systemic threats 5, 6 and 8*
- **Accelerate progress towards an ecosystem-based approach to managing Scotland's land and catchments.**
  - *Impacting particularly on numbers 1, 2, 6, 10, 11, 12, 14 and 16*
  - *Not sufficiently addressing the systemic threats in general*

Marine Scotland

The Trust welcomes progress made by MS regarding: the creation of a National Marine Plan; Marine Protected Areas; extensions to seabird SPAs; the harbour porpoise SAC; and Scotland's Marine Atlas (which is a useful baseline on the state of Scotland's Seas).

However the Trust believes MS could do more to address:

- **Biodiversity/Natura responsibilities in relation to renewables casework** – some of the marine offshore cases taken to Judicial Review are perhaps a case in point.
- **INNS problems** through better co-ordination and resourcing of activities.
- **Sustainable management of marine fisheries** - work has been slower than anticipated and so there needs to be a real push to deliver on a new sustainable model through the implementation of the Scottish Inshore Fisheries Strategy and the development of the Inshore Fisheries Bill.
- **The lack of progress under the Marine Strategy Framework Directive in relation to:** a) development of indicators of health; and b) monitoring programmes to assess status. MS (and the agencies) are not adequately resourced to address either of these or the issue of marine offshore post-consent monitoring, compliance and assessment checks.
- **The urgent need to move from the National Marine Plan into operational regional planning models around Scotland** and, where this marries up with the Land Use Strategy, ensure effective integration around coastal areas.

Using the right tools to address the key threats

The Trust believes more needs to be done across agencies and government – using tools that are already available – to tackle the eight systemic threats to Scotland's biodiversity and our priorities would be:

- **Applying Ecosystem Health Indicators** – to prioritise action at the catchment scale and coordinate activities across agencies (using integrated catchment management plans/regional land use planning partnerships), in order to direct resources effectively towards improvements in ecosystem health.
- **Having fit-for-purpose legislation regarding deer management, along with more robust implementation** by SNH to tackle habitat degradation

- **Applying a more systemic and coordinated approach to tackle diffuse pollution and invasive non-native species** at the catchment scale (e.g. through integrated catchment management plans and regional planning partnerships)
- **Ensuring robust implementation of government planning/place-making policy** to decrease the number of poorly located and badly designed developments being submitted/approved
- **Applying more natural capital analysis** to ensure sustainable decisions are taken to manage marine resources to achieve healthy seas
- **Applying more natural capital analysis to enable better decision making** with regards to monocultural land uses such as intensively managed grouse moors
- **Adequately resourced management of SSSIs**
- **More ambitious actions and policies, matched with resources to mitigate and adapt to the effects of climate change such as:**
  - Delivery of a National Ecological Network
  - Achieving a minimum of 21,000 ha of peatland restoration per year
  - Increasing the area of native woodland
  - Protecting soil biodiversity and improving carbon sequestering capacity of agricultural soils
  - Realising the potential of Scotland's blue carbon stocks<sup>13</sup>
  - Developing and implementing a coastal change strategy for all of Scotland's coastline, aligned with the Land Use Strategy/integrated catchment management plans/regional marine plans
  - Using nature-based solutions to tackle increased risk of flooding

Reduced budget impacts on the Third Sector

Additional to what has been stated above, the Trust believes that Framework Grants<sup>14</sup> have been a highly effective and efficient way of delivering national outcomes and need protection from further cuts. The budget cuts to the agencies have been passed on to the Third Sector and this is having severe impacts including:

- Reduced funds for direct delivery of agreed actions of the various strategies bulleted above, including fewer opportunities for partnership (landscape-scale) projects
- Reduced leverage, meaning less money coming into Scotland from match funds through routes such as LIFE and Heritage Lottery Funding
- Reduced unrestricted funds which means the essential core functions of charities are increasingly hard to fund securely in the long term. This leads to a reduction in charitable activities and ultimately delivery of shared goals which impacts on the National Outcomes.

Conclusion

The Trust believes a more joined up approach is needed between public bodies (not just SNH and SEPA, but Forestry Commission Scotland, Scottish Water, Local Authorities and others), with a sharper focus on the pressure points on our stocks of natural capital and what needs to be done most urgently to address these.

At the moment, due to the scale and complexity of the issues, it's hard to distinguish in some of the relevant documents between top level outcomes and the outputs that will contribute to achieving them. The ambition should be to:

- Identify who owns and manages Scotland's most significant natural capital assets.
- Quantify which stocks of natural capital are most at risk (from the eight threats we have identified), what needs to be done to address these risks and who is ultimately responsible for driving the change.
- Quantify which stocks of natural capital have the greatest capacity to address major societal challenges such as climate change, extreme weather events, obesity, mental health issues and poor air quality – and who should be acting on the findings.
- Ensure clear differentiation between activities, outputs and outcomes – and how they will be measured (for example Ecosystem Health Indicators and how these will work in relation to the Natural Capital Asset Index).

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<sup>1</sup> Additional to Scotland Performs, other key plans defining the work of SNH, SEPA and MS include Scotland's Economic Strategy; National Planning Framework 3; Getting the best from our Land: A Land-use Strategy for Scotland 2016-2021; Scotland's Biodiversity: It's in Your Hands and Scotland's Biodiversity: a routemap to 2020; Climate Ready Scotland: Scotland's Climate Adaptation Programme; River Basin Management Plan for the Scotland River Basin District: 2015-2027; Scotland's National Marine Plan: a framework for managing our seas and the Trust's assessment reflects requirements set out in these strategies and policies too

<sup>2</sup> Natural Capital can be defined as the stocks of natural assets which include geology, soil, air, water and all living things

<sup>3</sup> <http://www.snh.gov.uk/docs/B814140.pdf>

<sup>4</sup> <http://www.gov.scot/About/Performance/scotPerforms/indicator/naturalcapital#influence>

<sup>5</sup> <http://www.snh.gov.uk/docs/B814140.pdf>

<sup>6</sup> Nature Conservation (Scotland) Act 2004

<sup>7</sup> The actual resource spent is lower than this, as in year in 15/16, and in 14/15, SNH were instructed to stop committing funds and to hand back money to Scottish Government and so the actual cash spent in 15/16 was £53.566m – which is £750k less than originally agreed.

<sup>8</sup> See Trust Nature in Brief: [http://scottishwildlifetrust.org.uk/docs/002\\_057\\_natureinbrief\\_naturebasedsolutions\\_aug2013\\_1377858417.pdf](http://scottishwildlifetrust.org.uk/docs/002_057_natureinbrief_naturebasedsolutions_aug2013_1377858417.pdf)

<sup>9</sup> <http://www.gov.scot/About/People/Directorates>

<sup>10</sup> Also now as Local Biodiversity Sites- see Trust's policy:

[http://scottishwildlifetrust.org.uk/docs/002\\_057\\_publications\\_policies\\_Local\\_Biodiversity\\_Sites\\_policy\\_October\\_2011\\_1320168159.pdf](http://scottishwildlifetrust.org.uk/docs/002_057_publications_policies_Local_Biodiversity_Sites_policy_October_2011_1320168159.pdf)

<sup>11</sup> The [Regulatory Reform \(Scotland\) Act](#), passed by the Scottish Parliament in January 2014, gave SEPA a new statutory purpose. In short, our statutory purpose is to protect and improve the environment (environmental success) in ways that, as far as possible, create health and well-being benefits (social success) and sustainable economic growth (economic success) – text from SEPA's website

<sup>12</sup> See: <http://www.sepa.org.uk/making-the-case/soil/priority-catchments/>

<sup>13</sup> See: [http://scottishwildlifetrust.org.uk/docs/002\\_433\\_final\\_blue\\_carbon\\_briefing\\_march\\_2016\\_1469434363.pdf](http://scottishwildlifetrust.org.uk/docs/002_433_final_blue_carbon_briefing_march_2016_1469434363.pdf)

<sup>14</sup> E.g. SNH SNH-SWT Concordat – Framework Grant Arrangements