Email to:
Biodiversity@gov.scot
CC:
John Mouat, John.mouat@gov.scot
Michael McLeod, Michael.McLeod@gov.scot
Liz Walker, Liz.Walker@gov.scot

Biodiversity Team
Scottish Government
3H South
Victoria Quay
Edinburgh,
EH6 6QQ

05 September 2022

To whom it may concern,

Response to: The Scottish Government: Scottish Biodiversity Strategy 2022 Consultation – 20 June 2022

Scottish Renewables is the voice of Scotland's renewable energy industry. Our vision is for Scotland to lead the world in renewable energy. We work to grow Scotland's renewable energy sector and sustain its position at the forefront of the global clean energy industry. We represent over 300 organisations that deliver investment, jobs, social benefit and reduce the carbon emissions which cause climate change.

Our members work across all renewable energy technologies, in Scotland, the UK, Europe and around the world, ranging from energy suppliers, operators and manufacturers to small developers, installers, and community groups, as well as companies throughout the supply chain. In representing them, we aim to lead and inform the debate on how the growth of renewable energy can provide solutions to help sustainably heat and power Scotland's homes and businesses.

Scottish Renewables (SR) welcomes the opportunity to provide our view on The Scottish Government's consultation on the Scottish Biodiversity Strategy due for publication in 2022.

We broadly welcome and support this Biodiversity Strategy. Our members have a good awareness of the climate emergency and biodiversity crises as being two of the most urgent (and inseparably linked) policy responsibilities facing our generation.

Our members have already made an important contribution by demonstrating how the private sector can deliver biodiversity outcomes through habitat management (at a significant scale) funded by renewable energy developments. This in turn has led to notable innovations in the development of practical techniques for the restoration of biodiversity, particularly in the area of peatland restoration. We want to ensure as far as possible that this biodiversity strategy will provide the right structures to allow us to continue to deliver practical habitat management, especially where development projects overlap with areas where there are opportunities for habitat restoration.

In responding to this consultation, our members have highlighted the following points as being of particular importance:

- Firstly, 2045 is an important date for our members in seeking to help implement the practical conditions for success in relation to Scotland's

6th Floor, Tara House, 46 Bath Street,
Glasgow, G2 1HG
0141 353 4980 @ScotRenew
www.scottishrenewables.com

ambition to achieve net-zero. Given the intimate inter-connectedness of renewable energy generation, climate change and biodiversity loss, we feel the strategy should be more explicit about this connection, and thus the priority that will need to be given to land uses that mitigate emissions; specifically peatland restoration and renewable energy developments.

- A particular concern is the potential for conflict and divergence in the policies and strategies aiming to address the climate and biodiversity crises. Harmonised and proportionate action are required to meaningfully address both crises in tandem, and the strategy should recognise explicitly the need for essential infrastructure to tackle the climate and biodiversity crises, including renewable energy infrastructure.
- A related point is in connection with the strategic vision. Our members feel this vision fails to communicate the urgency required in relation to practical actions that will be effective in arresting biodiversity loss.
- Renewable energy developments, such as onshore wind, can represent significant opportunities to enhance biodiversity. This includes the management and restoration of degraded peatlands. There can also be opportunities to facilitate and encourage public access to nature and the countryside, facilitating the draft strategy's ambition of outdoor learning. Acknowledgement of these points in the strategy will help to set a positive framework to encourage development that positively contributes to addressing these strategic objectives.
- It is acknowledged that renewable energy developments can also have adverse impacts on biodiversity, through habitat loss and disturbance. However, the draft Scottish Biodiversity Strategy cannot undermine the current planning balance on these matters, which acknowledges the overriding benefits to biodiversity in reducing climate change from renewable energy development.
- Lastly and most importantly, our members agree the weakest part of this strategy is the section on 'conditions for success'. We recognise that the strategy acknowledges the complexity of the issue but feel that more could be done at this stage in terms of identifying actions to be taken now. In summary, more practical detail is required in this section if we are serious about translating the strategic vision into real actions on the ground that will begin to deliver the biodiversity outcomes we need before 2045. In particular, the strategy needs to explicitly acknowledge that public funding for practical conservation work will not be sufficient to deliver this vision and needs to make maximising the effectiveness of private sector finance a priority.
- There are already examples of projects where funding and leadership from the private sector are delivering real-world results, such as the Regional Golden Eagle Conservation Management Plan in the Central Highlands. The RECMP serves as a model for the broad spectrum of biodiversity benefits that can be derived from such partnerships; with unprecedented increases in golden eagle numbers in this region, and data from the project informing the development of enhanced assessment tools to inform decisions that affect this species. More broadly, the opportunities for Environmental and Social Governance drivers in the private sector to lead, fund and deliver biodiversity initiatives needs to be given prominence in the strategy.

A coherent strategy should set out a plan of action for achieving specified outcomes. However, the draft Scottish Biodiversity Strategy 2022 sets out no such mechanisms for achieving the overriding vision and outcomes. Further information, stakeholder engagement and consultation are required from The Scottish Government on how the draft Biodiversity Strategy can be delivered.

Although the National Planning Framework 4 (NPF4) is currently in draft form, it is expected to be submitted in its final draft form to the Scottish Parliament this Autumn[1] and will come into force before the end of 2022. It is imperative therefore that if the implementation of the Scottish Biodiversity Strategy requires any substantive change to the planning process, these should be reflected in an updated draft NPF4 for consultation and cannot undermine the statutory targets for net-zero 2045.

Scottish Renewables would be keen to engage further with this agenda and would be happy to discuss our response in more detail.

Yours sincerely,

Mark Richardson
Senior Policy Manager | Onshore Wind & Consenting
mrichardson@scottishrenewables.com
Scottish Renewables

[1] The Scottish Government, Chief Planner's Letter, 01 July 2022.

Overview

The Scottish Government is seeking views for their Biodiversity Strategy, which is due for publication in 2022.

The Strategy is the starting point in a process which will lead to the development of rolling delivery plans and, through the introduction of a Natural Environment Bill, statutory nature restoration targets.

The consultation forms part of an engagement process with a wide range of stakeholders interested in Scotland's biodiversity, including land managers, environmental organisations, local authorities and other partners. The Scottish Government held a series of workshops to scope out the detail of the strategy, develop ideas and test concepts. They now want to hear the views of a wider range of organisations and individuals to test and further develop their ideas.

The consultation paper is set out as follows:

- The Evidence: a short section setting out the evidence of biodiversity loss both globally and in Scotland
- Scottish Government Strategic Vision
- How Will It Be Known When They Have Succeeded:
  - High level milestones for the strategy
  - An outline of the outcomes approach The Scottish Government has developed to help them think about what they need to do to get to what they want to achieve
  - Indicative outcomes for 2045 and 2030 milestones.
- Conditions for Success: what do Scottish Government need to put in place to ensure that they deliver the outcomes they want

Why our views matter

Biodiversity is central to all of our lives and it is now very widely accepted that biodiversity is in crisis, both globally and in Scotland.

We all depend on biodiversity and so the biodiversity crisis affects everyone. It provides the natural resources which provide our food, and enable our land and sea based businesses to operate. It helps prevent flooding, soil erosion, purifies our water and contributes to our wellbeing, by providing recreation and a sense of place. It is also crucial to removing greenhouse gas emissions from our atmosphere.

We face twin reinforcing crises – a decline in biodiversity will make the climate crisis worse and a changing climate will increase the rate of biodiversity loss. Biodiversity is the best chance we have to adapt to climate change and ensure we continue to be able to enjoy the things that nature provides, on which we all depend.

The Scottish Government is consulting to get views on how we should tackle the biodiversity crisis. We need to transform the way we use and manage our natural resources. Our views will help shape the new Biodiversity Strategy which aims to help drive this transformation.

RESPONSE TO CONSULTATION QUESTIONS

The evidence of biodiversity loss

The evidence of biodiversity loss, both nationally and globally, continues to mount. In Scotland, sources of evidence include Scotland's Biodiversity Strategy Indicators; the 2019 *State of Nature* report; the Biodiversity Intactness Indicator; Scotland's Marine Assessment 2020; the 6-yearly assessment of progress towards Good Environmental Status under the UK Marine Strategy (which was last updated in 2019); and periodic assessments undertaken by The Convention for the Protection of the Marine Environment of the North-East Atlantic (the 'OSPAR Convention').

In Scotland, almost all of the land surface has been altered by us, resulting in one of the lowest biodiversity intactness indexes in the world undermining our ability to rely on our natural environment to hold onto its carbon stocks and sequester greenhouse gas emissions. It is increasingly recognised that the climate and biodiversity crises are intrinsically linked and need to be tackled together.

Globally, when they are functioning well, ocean and land ecosystems remove around 50% of human-made CO_2 emissions each year: our failure to protect our natural resources is reducing our ability to tackle climate change. The more global warming exceeds 1.5°C, the more likely we are to experience major impacts on ecosystems, triggering feedback loops that will accelerate warming.

Children's contact with the natural world is in decline and according to recent research from the RSPB, four out of five UK children are not connected to nature.

1. 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?

SR members **agree** that there is a nature crisis in Scotland. Many of our members regularly commission extensive ecological survey work in (for example) the uplands and in the marine environment, through which they obtain first-hand evidence of the nature and extent of the biodiversity challenges in Scotland.

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

These challenges and opportunities are of course seen as intimately connected for our members. Our practical actions in attempting to tackle both crises centre around the sensitive design of renewable energy projects. One key opportunity is that renewable energy developments are often sited in areas where there are habitats and species that are already under pressure from climate change and other factors (notably peatlands). These can be brought under positive management for biodiversity as part of the development process, where consenting and funding mechanisms work positively and effectively to realise these opportunities.

The climate and biodiversity crises must be addressed in tandem, as recognised by the Scottish Biodiversity Strategy. A key concern for our members is the potential for conflict and divergence in policies and strategies aiming to address the climate and biodiversity crises. We note that Section 5 of the consultation acknowledges that "*Reversing biodiversity loss cannot be achieved through traditional conservation measures alone – these must be accompanied by a more fundamental, society-wide shift to sustainable consumption and production*."

However, the Scottish Biodiversity Strategy has the opportunity to go further to ensure that it advocates for harmonised and proportionate action that will meaningfully address both the climate and biodiversity crises.

Funding is the primary challenge in our view; examples, where there has been some measure of success in addressing biodiversity issues (species re-introductions, large-scale upland management), are generally where conservation projects are adequately funded. We would highlight the Regional Eagle Conservation Management Plan[2] in the Central Highlands as a case study of the kind of approaches to biodiversity issues that private sector initiatives (and renewable energy projects in particular) can deliver. In relation to funding, there is ample evidence to show that nature conservation measures secured and funded as part of wind farm consents present an emphatic synergy between the climate and nature crises (the twin key themes which will be maintained in NPF4).

The consultation recognises that climate change represents a significant risk to biodiversity, stating that "*The more global warming exceeds 1.5°C, the more likely we are to experience major impacts on ecosystems*…". It is therefore essential that any actions to deliver nature recovery also facilitate, and importantly avoid impeding, the delivery of essential infrastructure to progress towards net-zero, including renewable energy infrastructure.

Further, it is important to recognise the biodiversity benefits that responsible development can facilitate. ScottishPower Renewables (SPR) has, for example, delivered a wide range of biodiversity initiatives at their sites, including the restoration of degraded peatland habitat, creation of native woodlands and species monitoring. SPR currently manages approximately 8,500 hectares of peatland habitat and has spent £2.5m on peatland restoration and research over the last decade. Their work demonstrates the kinds of opportunities that the design, planning, construction and operation of renewable energy developments provide in the realising opportunities to deliver high-quality environmental outcomes and to enhance conditions for species, habitats and biodiversity as a whole.

Considering the above, we recommend that the Scottish Biodiversity Strategy be strengthened as follows:

- Expand the strategy to provide stronger recognition of the need for essential infrastructure to tackle both the climate and biodiversity crises, including renewable energy infrastructure.
- Acknowledge the biodiversity benefits that responsible development can provide, to ensure the strategy sets a positive framework for development.

We are also unclear on the potential policy and regulatory implications of the Scottish Biodiversity Strategy. If the Biodiversity Strategy requires any substantive changes to policies or regulations, these should be subject to detailed consultation.

Attached as an appendix to our consultation response is the SR publication, *Wind Power and Peatland: Enhancing Unique Habitats*, and *Carbon-rich Soils, Deep Peat and Priority Peatland Habitat: Expert Views on Project Level Assessment* produced by Natural Power and endorsed by SR.

[2] SSE Renewables, RECMP Regional Eagle Conservation Management Plan, https://www.sserenewables.com/who-we-are/our-sustainable-approach/recmp/

Scottish Government strategic vision – framing and context

We have developed the following vision for Scotland's new biodiversity strategy which captures what success looks like in 2045 – what the strategy is setting out to accomplish:

Draft Vision

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.

3. Is the draft vision clear enough? *Yes / No*

No. To glibly assert that we can almost completely solve the biodiversity crisis by 2045 our members agree is naive. We would expect a vision that more accurately communicates the gravity of the crisis to strike a note of humility and urgency.

Many of our members regularly interact with ecologists and others working at the 'coal face' of the biodiversity crisis. The declines in biodiversity are complex, cross borders and in many cases will take long periods of time to address. Some climate-change-related biodiversity losses may already be irreversible in Scotland. For these reasons, we question if the draft vision is too positive. It is almost akin to presenting a vision of achieving climate cooling by 2045 by making tremendous progress with Scotland's CO_2 emissions targets. On the other hand, we recognise the importance of a positive vision and a constructive message. We recommend an addition to balancing the positive messages whilst reflecting the urgency of the situation and the need for action as proposed below:

> *'By 2045 ~~we will~~ ~~have averted at least some of the localised extinctions that are predicted if current trends continue.~~*
>
> *we will have made the changes needed to our infrastructure, land use and patterns of consumption to effectively mitigate the effects of both the climate and biodiversity crises.*
>
> *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.'*

Furthermore, considering that this Strategy is seeking to tackle both the climate and biodiversity crises at the same time, there must be recognition incorporated within the vision of the benefits that reaching the net-zero target by transitioning to renewable energy could bring to both the biodiversity and climate crises.

4. Is the draft vision ambitious enough? *Yes / No*

Our members suggest that the draft is too ambitious. There is a risk that this kind of high-level arguably utopian language lulls us into a false sense of security, and that without committing to something more specific this will lead to collective complacency about how the strategy is delivered.

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

No comment.

a. Development of an outcomes framework

Ministers have defined two key milestones to guide Scottish Government in delivering the strategy and its vision:

- reverse biodiversity loss by 2030 (in line with the Leaders' Pledge for Nature); and
- deliver the Vision by restoring and regenerating biodiversity by 2045.

A group of experts have been advising the strategy development process and with some of Scottish Government's stakeholders have helped them to develop a set of outcomes which will deliver these 2030 and 2045 milestones. These outcomes are framed by broad landscape type and marine environments and draw on recently published works.

- **Rural environments**
  - farmland
  - woodlands / forestry
  - soils
  - uplands (including peatlands)
- **Marine environment**
- **Fresh water environments** – rivers, lochs and wetlands
- **Coastal environments**
- **Urban environments** – towns and cities
- **Across our land and seas** – overall ecosystem health, resilience and connectivity.

The following sections will break down these broad landscape type and marine environments and their proposed outcomes.

b. Proposed outcomes – See: Consultation paper – p. 11 - 16

6. Do the 2045 outcome statements adequately capture the change we need to see?
Yes / No

Yes. We broadly agree that this captures the direction of change needed. To be truly useful and engaging for a consultation, we need more specific detail to provoke a more constructive discussion. Stakeholders will arguably not disagree with aiming for 'high standards of sustainable land use'. But if the renewables industry is to collaborate to help deliver the strategy successfully, we need to know more about proposed mechanisms, perhaps to consider setting quantitative targets.

We already have a similar set of outcomes defined in the SPP and draft NPF4. We appreciate that setting specific actions is complex due to the scope of the biodiversity crisis and that the strategy states that *"The new biodiversity strategy is the starting point in a process which will lead into the development of rolling delivery plans and, through the introduction of a Natural Environment Bill, statutory nature restoration targets".*

However, it would be beneficial for the strategy to provide more practical detail at this stage. We would prefer to see this strategy focus on tactics, specific commitments, and actions, with a focus on funding and delivery. This is where the renewable energy industry can help if viewed as a partner and not a threat. We would like to see Section 4 revised and expanded to:

- provide stronger recognition of the need for essential infrastructure to tackle both the climate and biodiversity crises, including renewable energy infrastructure.
- Acknowledge the biodiversity benefits that responsible development can provide, to ensure the strategy sets a positive framework for appropriate development.

Attached as an appendix to our consultation response is the SR publication, *Wind Power and Peatland: Enhancing Unique Habitats*, and *Carbon-rich Soils, Deep Peat and Priority Peatland Habitat: Expert Views on Project Level Assessment* produced by Natural Power and endorsed by SR.

7. Are the 2030 milestones ambitious enough? *Yes/No*

No. For some sectors, this will be business as usual, due to the lack of detail in the milestones and the outcomes.

We already have an ambitious milestone in relation to peatland restoration (250,000 hectares by 2030) but we are only achieving a fraction of what is required at the present time. In our view, this highlights that we need to focus more on the delivery mechanisms.

Whilst we acknowledge it is a complex and difficult task, the plan reads as though reform of the agricultural subsidy system is in and of itself the deliverable for 2030. It may take some time to complete this reform, but we are not going to be on track for a 2045 target if it takes us till 2030 to start to have the right incentives in place for rural land management.

8. What are the key drivers of biodiversity loss in this outcome area?

No comment.

9. What are the key opportunities for this outcome area?

SR members suggest that tackling the degradation of our uplands presents arguably the largest opportunity by area.

Renewable energy developments are routinely sited in Scotland's rural environment and represent a significant opportunity to facilitate nature recovery, through both funding and the practical implementation of conservation and nature enhancement measures. Therefore, as per our responses to Questions 2 and 6, the Biodiversity Strategy should recognise this in order to present a positive strategic framework for appropriately sited renewable energy developments.

10. What are the key challenges for this outcome area?

A key challenge in addition to funding and resourcing already mentioned is that renewable energy developers do not own the land and this can restrict the measures that we are able to implement as a result.

Marine environment proposed outcomes

By 2045 we expect that:

- Populations of marine mammals, marine birds and fish are healthy, have recovered, and have increased resilience to the impacts of climate change;
- The health of water-column and seabed habitats has been enhanced so that they are more resilient (including to climate change), supporting wider ecosystem function and providing increased benefits to society.

Which means that by 2030 we need to have:

- Populations of marine mammals, marine birds and fish are improving - reflecting prevailing environmental conditions and not significantly affected by human activities;
- The status of water-column and seabed habitats is improving - managed to avoid significant impacts from human activities to support their recovery and provide benefits to society.

11. Do the 2045 outcome statements adequately capture the change we need to see? ***Yes/No***

While we recognise the intent of the expectations, the outcome statements need to be more specific to enable developers to highlight in their Environmental Statements how much their projects are contributing to these expectations.

Further, our members are concerned that the outcome statements do not address the fact that climate change is already changing species and distribution. What 'healthy' is remains unclear and ambiguous. Again, a reference point/baseline would be useful here. What are we comparing to in 2045?

12. Are the 2030 milestones ambitious enough? ***Are we missing any key elements?***

The 2030 targets are hugely ambitious given the current avian flu pandemic which could have a lasting effect and is predicted to put some species into unfavourable conservation status. Climate change is already affecting fish populations as is the pressure of overfishing. Some fundamental management changes are required to reverse this if we are serious about reaching this 2030 target. These management practices cannot be controlled/enacted by the renewable sector but can be facilitated by the sector.

We need to have an adequate baseline to draw from to understand if we are actually improving things. In the marine environment, this is challenging due to scale so it may be that we need to rely on eDNA and analyse current data sources to 'baseline' against as measuring biodiversity is more than the species that are surveyed routinely.

It is also our recommendation that the benefits to communities are also included.

13. What are the key drivers of biodiversity loss in this outcome area?

Climate change, overfishing and arguably pollution.

14. What are the key opportunities for this outcome area?

To establish a robust baseline from which to measure against. To work with the renewables developers to implement management measures around fishing and for example improving water quality.

15. What are the key challenges for this outcome area?

Our seas are crowded, due to overlap between areas suitable for renewable energy, fishing, and marine protected areas (including the development of Highly Protected Marine Areas). The designation of additional protected areas puts pressure on the remaining areas due to competing demands.

Measuring the health of individual species and mammal populations is difficult so we would recommend not focussing solely on individuals and instead focussing on the health of ecosystems as a whole.

Freshwater environment - proposed outcomes

By 2045 we expect that:

- The extent of restored catchments and improvements in ecological status of rivers, lochs and wetlands has increased;
- Extent, condition, connectivity and resilience of wetland, including floodplain wetlands, and pond habitats are significantly improved and increased;
- Freshwater species return naturally to areas in which they have been absent; their populations and supporting habitats are robust and resilient to extreme events.

Which means that by 2030 we need to have:

- Catchment, river, lochs and floodplain restoration routinely accepted and used as a nature-based solution to climate impacts;
- Beavers, salmon recovery and riparian woodland evident as growing ecological components of restored rivers and wetlands.

16. Do the 2045 outcome statements adequately capture the change we need to see? *Yes/No*

No comment.

17. Are the 2030 milestones ambitious enough? *Are we missing any key elements?*

SR members recommend defining a milestone in relation to Invasive Non-Native Species.

18. What are the key drivers of biodiversity loss in this outcome area?

No comment.

19. What are the key opportunities for this outcome area?

Protecting freshwater environments is an area that often requires direct management as part of renewable energy developments. This can take several different forms including careful management of runoff from site infrastructure such as tracks and taking precautions to ensure pollution risk near watercourses is strictly controlled.

A specific example of how a wind farm located in the catchment of an important river system can help the freshwater environment is the fish passage installed at EDF Renewables' Fallago Rig wind farm in the Scottish Borders. The fish passage was constructed as part of the wind farm development and takes the form of a series of stepped pools in the river leading up to two large culverts that were used as part of building a crossing point for the site tracks. This helps facilitate the passage of migratory fish upstream. In recent times the fish passage has been enhanced by the provision of larger rocks to better delineate the stepped pools and wooden baffles installed within the culverts to help the fish move upstream. This work has been carried out working in close consultation with The River Tweed Commission and is a good example of how a wind farm project can work successfully to protect important aspects of the freshwater environment.

20. What are the key challenges for this outcome area?

No comment.

Coastal environment – proposed outcomes

By 2045 we expect that:

- Coastal ecosystems and adaptive management more widely adopted to allow naturally functioning coastlines in response to a changing climate;
- Abundance and demography of coastal bird species indicate healthy populations that have recovered in line with changing conditions.

Which means that by 2030 we need to have:

- Coastal ecosystems, including lagoons and estuaries, managed for biodiversity and the dynamic processes underpinning this;
- Management is tailored to nature-based solutions to climate impacts, notably sea level rise and coastal erosion;
- Machair and saltmarshes managed extensively for biodiversity richness and to respond dynamically to climate change impacts.

21. Do the 2045 outcome statements adequately capture the change we need to see? ***Yes/No***

No comment.

22. Are the 2030 milestones ambitious enough? ***Are we missing any key elements?***

No comment.

23. What are the key drivers of biodiversity loss in this outcome area?

No comment.

24. What are the key opportunities for this outcome area?

National Grid's Offshore Transmission Network Review (OTNR) poses some opportunities by reducing the number of cables making landfall that could impact biodiversity in those areas.

25. What are the key challenges for this outcome area?

No comment.

Urban landscapes - proposed outcomes

By 2045 we expect that:

- All towns and cities will comprise established nature-rich environments, with measurable increases in urban biodiversity;
- Multi-functional urban Nature-based solutions provide the basis for healthy and resilient communities (enabling people and biodiversity to adapt to our changing climate by cooling the urban environment and managing extreme rainfall events);
- Blue and green infrastructure is designed and managed to have high biodiversity value.

Which means that by 2030 we need to have:

- Nature-rich networks with growing biodiversity richness comprising a range of habitats are integrated into the urban fabric, and ecologically coherent;
- Nature-richness is a feature of all developments, and prominent in school, health, neighbourhood and community spaces;
- Opportunities to retrofit green and blue infrastructure that includes measures to enhance biodiversity are identified.

26. Do the 2045 outcome statements adequately capture the change we need to see? ***Yes/No***

No comment.

27. Are the 2030 milestones ambitious enough? ***Are we missing any key elements?***

Our members highlight that Invasive Non-native Species are more of an issue in urban environments.

28. What are the key drivers of biodiversity loss in this outcome area?

No comment.

29. What are the key opportunities for this outcome area?

No comment.

30. What are the key challenges for this outcome area?

No comment.

Across our land and at sea – proposed outcomes

By 2045 we expect that:

- On land, Nature Networks at landscape scale demonstrate widespread increasing resilience and health of species and habitats, and increases in carbon sequestered across ecosystems;

- Ecosystems are diverse, healthy, resilient and deliver a wide range of ecosystem services.

Which means that by 2030 we need to have:

- Spatially identified Nature Networks which are widespread and embedded in land use planning and management;
- Increases in the diversity of ecosystems which therefore deliver stronger functioning, ecosystem health, resilience and ecosystem services.

Achieving the vision

Achieving the strategy vision and halting biodiversity loss by 2030 and substantially restoring it by 2045 will depend on progress across all of these outcomes. Critically, due to the complex relationships between ecosystems, land types and marine environments we will need to see progress in all areas – falling short on one outcome will undermine the overall goal.

31. Do the 2045 outcome statements adequately capture the change we need to see? *Yes/No*

No comment.

32. Are the 2030 milestones ambitious enough? *Are we missing any key elements?*

No comment.

33. What are the key drivers of biodiversity loss in this outcome area?

Our members highlight linear infrastructure projects as a key driver in this outcome area.

34. What are the key opportunities for this outcome area?

No comment.

35. What are the key challenges for this outcome area?

No comment.

36. To what extent will these outcomes deliver the Vision? *What might be missing?*

In general, the proposed outcomes should contribute towards achieving the Vision of the Biodiversity Strategy and we agree that progress is required across all environment types. As per our answer to Question 6, whilst we broadly support the proposed outcomes, the Biodiversity Strategy does not confirm the actions that will be taken to progress towards and achieve these outcomes.

We appreciate that setting specific actions is complex due to the scope of the biodiversity crisis and that the strategy states that "*The new biodiversity strategy is the starting point in a process which will lead into the development of rolling delivery plans and, through the introduction of a Natural Environment Bill, statutory nature restoration targets*".

However, it would be beneficial for the strategy to provide an action plan that outlines how The Scottish Government intends to achieve its Vision and the next steps in the process. In the absence of such an action plan, or, at least, further detail on the next steps, it is difficult to see how the Vision can be meaningfully delivered.

37. What evidence and information should we use to assess whether we have delivered the Vision?

No comment.

The conditions for success

Read about the conditions for success here

The new Scottish Biodiversity Strategy aims to establish a shared vision for biodiversity and a set of outcomes which will deliver that vision. It will provide a framework for ensuring alignment of key policies (for example between biodiversity, climate change and land use). It aims to drive coordinated action across key sectors.

A key part of the success of this strategy will be based on ensuring we correctly identify:

- factors which have limited the success of previous strategies; and
- an appropriate governance framework to ensure accountability for delivering the strategy.

In this way, we will give ourselves the best chance of delivering on our vision.

Proposed outcomes – see Consultation paper – p. 26 – 27

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

Our members highlight that the key challenge here is in translating high-level strategy into practical action, and so it is this part of the strategy that is the most important in our view. It is the experience of our members that engagement with similar strategies tends to be ineffective in practice when the outcomes are such abstract concepts. Further, strategies of this nature tend to proliferate discussion papers, working groups, and even (notably in the past in relation to biodiversity) 'action plans' which in and of themselves do not deliver any practical, actionable, or timely benefits.

SR members agree the plan could be more effective if it were to show further leadership by selecting examples of urgent conservation priorities and focusing heavily on delivery mechanisms for these.

The current planning system can sometimes lead to conservation efforts being targeted within a development site, where the same resources could deliver more significant biodiversity outcomes in a different location or as a contribution to a more strategic project. Given the urgency of the crisis, it is important that the strategy supports ways of maximising the biodiversity benefit from development projects.

However, we welcome the recognition in Section 5 that this issue needs to be 'mainstreamed' in all areas of policy and agree with this approach. It is difficult to understand what specific actions The Scottish Government are proposing when reading this section of the strategy. Therefore, it is our recommendation that Section 5 is redrafted to be made more specific, for example, revising the section on Ministerial leadership to provide further detail.

We support the breadth of commitment and general principles set out in this section. As above, to be more effective it is our recommendation that this section is reworked and re-worded. For example, a stated outcome of:

> '*a delivery model based on line of sight between governance of strategic outcomes and actions to deliver them*'

is difficult to respond to in a consultation of this nature. It is the view of our members that an explanation of what this means in practice (by providing a practical example), or at a minimum more detail is provided on the kinds of 'delivery models' envisaged.

Proposed regular reviews of the fitness for purpose of the legislative framework are welcomed.

We note the proposal that an independent body may monitor and report on progress. In this connection, we comment that an adequately funded and suitably led NatureScot, able to attract and retain authoritative biodiversity professionals would make it easier for our members to engage and consult meaningfully with statutory bodies through the consenting processes for complex developments. This would, we believe, lead to better outcomes for biodiversity and provide more certainty for businesses investing in such projects.

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

One example that could provide useful learnings is the South West Partnership for Environment and Economic Prosperity (SWEEP), which is a five-year programme to deliver environmental, economic and social benefits to the South West of the UK (Cornwall, Isles of Scilly, Devon and Somerset).

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? ***Can you provide any evidence which informed your conclusions?***

No comment.

END