

Response ID ANON-XW4X-6MU1-4

Submitted to Scottish Biodiversity Strategy 2022

Submitted on 2022-09-12 16:59:33

Introduction

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?

Please insert answer here:

Agree.

The evidence gathered and presented in the consultation document describes biodiversity decline that may be further impacted by climate change within a short period of time.

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

Please enter response here:

Scottish Water notes that climate change is mentioned only as an impact within the Strategy – there is a need to bring climate thinking and scenarios into strategic planning for biodiversity.

We believe that the commitments set out in the Strategy will succeed through sustained action, supported by access to funding for action on the ground; supported by targeted research and education

The climate and biodiversity crises are interlinked – nature is impacted by the climate, and nature can also buffer society from the impacts of climate change. This presents both challenges and opportunities, often within the same area:

1. Nature as a carbon sink

Scotland's land-carbon inventory identifies over 1 million hectares of eroded peatland that loses millions of tonnes of carbon dioxide each year. Climate change risks exacerbate this. An increased focus on restoration and management of peatland will deliver carbon mitigation, biodiversity enhancement and provide climate resilience by holding water in the land and reducing further erosion risk.

More widely, other land use pressures have severely limited the extent of Scotland's natural cool temperate rainforest ecosystems. We recognise the forestry targets set by the Scottish Government and are working hard to assess the suitability across our landholdings to deliver increased woodland cover to help address the issue of carbon and to improve biodiversity. A clear focus across public bodies on enabling woodland expansion would be helpful, recognising the need for it to work to support a resilient and sustainable rural economy.

2. Nature as a resource for renewable power

Wind and solar are key technologies to provide sustainable energy. Accommodating these within the landscape can present challenges from biodiversity, community and amenity perspectives. However, an increased focus on integrated planning in rural areas that sets clear goals for carbon, sustainability and biodiversity to deliver multiple benefits may help to direct landowners, operators and regulators to deliver more benefit at a pace needed to reflect the emergency.

3. Nature as a buffer to climate change impacts

Working with nature through catchment management and restoration will support both biodiversity and climate resilience (water quality, water quantity, soil erosion etc) as well as providing wider benefits to society. Equally, in the urban environment, creation of urban greenspace and tree canopy cover will support biodiversity connectivity, water management and contribute to reducing urban heat during extreme warm weather. This is critical to making our cities habitable in the future.

A greater focus on such nature-based solutions within planning and regulation would help to support their development and adoption. We are currently working to understand and promote such solutions across our services, and we find that this requires that we work in partnerships with others in order to deliver. Greater co-ordination of planning would make this more effective.

Our strategic vision – framing and context

3 Is the draft vision clear enough?

Yes

Please enter comments here:

The draft vision is clear but would be improved by supporting it with suitable metrics and targets within the strategy document. As it is, it's not clear what achieving the vision would look like in terms of the biodiversity status across Scotland.

The meaning of words used in this context, such as "substantially", "restored", "regenerated", "thriving", and "resilient" could be defined in a glossary and not used interchangeably.

4 Is the draft vision ambitious enough?

Yes

Please enter comments here:

However, adding the term “enhanced” would add ambition and take account of the re-introduction of native species and the potential natural progression of species due to climate change

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

Please enter suggestions here:

Scottish Water has no comment.

How will we know when we have succeeded?

Scotland’s rural environment – farmland, woodlands and forestry, soils and uplands

6 Do the 2045 outcome statements adequately capture the change we need to see?

Yes

Please enter response here:

Scottish Water considers that the required changes are adequately captured.

We consider it essential that connectivity is considered on a wider landscape scale and suggests that peri-urban areas can provide vital links between sites of similar biodiversity value.

7 Are the 2030 milestones ambitious enough?

Yes

Are we missing any key elements? Please enter response here:

We consider the 2030 milestone to be ambitious.

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

Please enter response here:

Scottish Water has no comment

9 What are the key opportunities for this outcome area?

Please enter response here:

Scottish Water’s landholdings cover 23,000 hectares across Scotland, including tenanted, operational and reservoir sites. They are rich in natural capital and provide key ecosystem services, such as carbon storage, sequestration and biodiversity.

We have ambitious plans to increase Scotland’s carbon sink which brings with it opportunities to create investment in the rural economy and to create places for nature and recreation that support adaptation and mitigation.

The approaches Scottish Water will be taking on these land holdings going forward include planting trees where suitable, restoring peatlands, and determining where biodiversity net gain can be achieved through use of a revised metric.

We are carrying out a natural capital and biodiversity baseline assessment for all full landholdings. The enhanced biodiversity metric developed by Natural Capital Research for Scottish Water makes use of the DEFRA metric as a starting point for the biodiversity assessment and builds on the approach to develop a metric that includes species-level data and connectivity to similar sites.

We would suggest that some attention and resources are focused on riparian zones. The development of appropriate woodland next to rivers would provide multiple benefits and biodiversity net gain.

10 What are the key challenges for this outcome area?

Please enter response here:

To achieve our plans to increase Scotland’s carbon sink, Scottish Water needs to engage widely with communities and land operators across operational forestry and agricultural lands. We are keen to discuss best practice approaches and engage with stakeholder groups.

The key challenge for supporting biodiversity at scale is to ensure there is a common focus supported by the relevant policies and planning frameworks that will help to target action across a broad and complex group of rural stakeholders.

The emerging Regional Land Use Partnerships could help support this and should be seen as a vehicle to bring the biodiversity strategy to life. Bringing all of the stakeholders/interests to work together is key to delivering this change.

We would suggest that some attention and resources are focused on both rural and urban riparian zones. The development of appropriate woodland next to rivers would provide multiple benefits and biodiversity net gain.

We would expect to be kept informed of current research programmes and deer management initiatives in order to enable natural woodland regeneration.

Marine environment

11 Do the 2045 outcome statements adequately capture the change we need to see?

Yes

Please enter response here:

However, for this document to be successful it needs to be accessible and unambiguous

It would be helpful for clarity and understanding if the source and definition of terms used, such as "healthy", were to be provided.

In addition, we consider that the use of "recovered" should be accompanied by a definition or target to explain what it means.

12 Are the 2030 milestones ambitious enough?

Are we missing any key elements? Please enter response here:

We would refer to our answer to question 11, above.

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

Please enter response here:

Scottish Water considers that the key drivers of marine biodiversity loss in the near-shore area are water-borne pollution and discharges from land-based activities (including aquaculture). These can be characterised as diffuse pollution from rural and urban land use and practices and point source pollution and litter driven by storm events.

14 What are the key opportunities for this outcome area?

Please enter response here:

Scottish Water believes that national strategies and plans that co-exist with the Scottish Biodiversity Strategy (SBS) can provide synergistic benefits when aligned. The review of the National Marine Plan (NMP) and the likely development of more Regional Marine Planning Partnerships (RMPP) will raise awareness and provide opportunities in the near-shore marine environment. The adoption of tools such as: zoning, where appropriate; proportional regulation; and the equitable enforcement of activities and operations at a regional level, within the framework of the NMP, should provide benefits.

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15 What are the key challenges for this outcome area?

Please enter response here:

Scottish Water has no comment

Freshwater environment: rivers lochs and wetlands

16 Do the 2045 outcome statements adequately capture the change we need to see?

Yes

Please enter response here:

The outcome statements adequately capture the required changes. We anticipate that further detail and clarity will be developed in the final strategy document and implementation plans.

17 Are the 2030 milestones ambitious enough?

Are we missing any key elements? Please enter response here:

The outcomes are ambitious in the timeframe. There is a lack of clarity on where responsibility lies for managing the process to allow the rivers and floodplains to reconnect while creating benefits but also ensuring key assets and functions are protected. A practical programme of improvements is needed to confirm that they can be met in the timelines proposed.

As a stakeholder, Scottish Water contributes towards achieving good status in waterbodies. Through the Quality & Standards process, Scottish Water and the Scottish Environmental Protection Agency (SEPA) agree interventions to meet the Water Framework Directive (WFD) River Basin Management Planning (RBMP) 2027 outcomes. Interventions to improve the water environment have been delivered throughout the 1st and 2nd RBMP cycles with some interventions to be delivered by the end of RBMP 3rd cycle in 2027.

At present we are not aware of processes beyond RBMP3 for identifying what further water environment improvements might be needed.

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

Please enter response here:

With reference to water resources (quantity) several issues are likely to be contributing to biodiversity-loss in freshwater. Examples of these are as follows: -

- climate change
- areas of water scarcity or drought
- river engineering
- demographic change/development
- increasing water demand for and for irrigation.

We investigate water availability at catchment-scale to determine if such drivers would have an impact on biodiversity and resilience to change.

Water quality may be affected by direct and diffuse pollution entering the freshwater environment, including urban and rural sources.

19 What are the key opportunities for this outcome area?

Please enter response here:

Scottish Water provides water and sewerage services across Scotland. We manage landholdings primarily to protect those rivers and reservoirs that supply drinking water. We believe restoration at a catchment-scale will provide the best outcomes for freshwater habitats and people.

We already include projected climate change impacts into our planning scenarios. These show that there will be less water available from most sources in the future, under climate change scenarios. Those of our projects that are reliant on water availability will be developed with these factors taken into consideration, to ensure all activities are undertaken in line with confirmed Environmental Standards and Scottish Government objectives.

20 What are the key challenges for this outcome area?

Please enter response here:

Scottish Water has no comment.

Coastal environments

21 Do the 2045 outcome statements adequately capture the change we need to see?

Yes

Please enter response here:

The outcome statements capture the change we need to see.

22 Are the 2030 milestones ambitious enough?

Are we missing any key elements? Please enter response here:

Yes the milestones are ambitious enough from Scottish Water's point of view.

We would like it to be borne in mind that we own many assets, such as pipelines, that operate in the coastal environment.

We welcome and support the proposal to manage nature-based solutions, such as salt marches, to protect the coast from erosion and encourage biodiversity.

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

Please enter response here:

Scottish Water considers that human activities are the key drivers of biodiversity loss including construction, development, and pollution. Impacts on fragile coastal areas may require to be controlled through education and restrictions on use and access.

24 What are the key opportunities for this outcome area?

Please enter response here:

Using nature-based solutions to maintain and encourage natural coastal habitats, structure, and species.

25 What are the key challenges for this outcome area?

Please enter response here:

The process of transitioning to regional marine planning, management of Invasive Non-Native Species (INNS), litter management, public use of and access to fragile areas.

Urban environments – towns and cities

26 Do the 2045 outcome statements adequately capture the change we need to see?

Yes

Please enter response here:

Scottish Water believes that the proposed outcome for 2045 is ambitious but achievable. We believe there is more that could be made of public infrastructure/spaces so that they work with nature and create nature-based solutions.

27 Are the 2030 milestones ambitious enough?

Are we missing any key elements? Please enter response here:

Scottish Water believes that ambitions should extend to planning in relation to businesses and consider restrictions on paving over private green spaces, thus managing the rate of flow through retention and attenuation of surface water.

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

Please enter response here:

Scottish Water believes the key drivers of biodiversity loss are related to lack and loss of urban green space, depleted natural ground cover (paving) and lack of connectivity between sites of similar habitats.

29 What are the key opportunities for this outcome area?

Please enter response here:

Scottish Water considers that all new developments and redevelopments could be required or encouraged to accommodate blue green infrastructure and relative areas of green space.

30 What are the key challenges for this outcome area?

Please enter response here:

Scottish Water considers that working with other stakeholders in urban environments, where multiple and seemingly incompatible activities and uses must co-exist, is how we will achieve the best outcomes for the environment.

Across our land and at sea – overall health, resilience and connectivity

31 Do the 2045 outcome statements adequately capture the change we need to see?

Yes

Please enter response here:

Scottish Water believes that people connecting with nature is strongly linked with place-based approaches, e.g. developing a wider awareness of how nature and biodiversity provide the ecosystem services on which we depend; the role nature plays in mitigation and adaptation; and the benefits to recreation, the economy and wellbeing, are all important in provoking the wider adoption of these climate solutions.

32 Are the 2030 milestones ambitious enough?

Are we missing any key elements? Please enter response here:

Scottish Water believes embedding biodiversity within planning at a national and local level is key to ensuring action is taken to meet the outcomes.

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

Please enter response here:

See earlier comments.

34 What are the key opportunities for this outcome area?

Please enter response here:

Scottish Water believes that we have an obligation and opportunity to work towards a sustainable approach and a circular economy, so that less resources are taken from the environment.

35 What are the key challenges for this outcome area?

Please enter response here:

Scottish Water believes that aligning the emerging strategy and other plans and finding a balance between proportionate regulation and community-led action at a local level is challenging.

36 To what extent will these outcomes deliver the Vision?

What might be missing? Please enter response here:

Scottish Water considers that the outcomes are comprehensive and well thought through, over all.

We anticipate that a mechanism for ensuring all outcomes are achieved is key to the vision being delivered.

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

Please enter response here:

Scottish Water considers that any monitoring framework should be joined up and used by all government organisations to allow for the easy comparison of data.

We are relatively unfamiliar with the biodiversity intactness score as identified in the consultation document. Were this be used to inform future targets we would welcome discussion and guidance.

The conditions for success

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

Please enter response here:

Scottish Water notes that there is no mention of current strategic levers, e.g. public body reporting duties. We believe that engagement is key to building a level of understanding and support for the actions we need to take with communities and land managers.

The Strategy should have the scope to support specific species, co-ordinate collaboration, and physical connectivity of sites for biodiversity within and across sectors and at different spatial scales. A framework for how we might develop clear metrics to inform targets and outcomes that are being sought should form part of the Strategy.

We believe it would be beneficial to see the draft Scottish Biodiversity Strategy and the draft National Planning Framework 4 simultaneously to understand the full provision of how nature and biodiversity are to be supported.

General Comments

Scottish Water very much welcomes the publication of the draft strategy as a key step towards setting out plans and actions to support biodiversity in Scotland. We strongly support the overall goals, vision and specific activity areas/outcomes of the strategy as they are set out – they are ambitious and provide a good focal point for action.

We agree with the focus in the strategy on leadership and action across all parts of the economy.

To support this, we would expect to see an outline of the expected targets, governance mechanisms and details of how the Scottish Government expects biodiversity to be represented in accounting and decision-making frameworks.

There are a number of improvements we would suggest as follows:

- To include views on which current strategic levers that might be used. For example, the public body reporting duties are a potentially significant source of information and progress reporting that the Scottish Government could use to stimulate action.

- We would welcome the development of clear metrics for biodiversity and biodiversity improvement/gain that would enable the Scottish Government to understand and evaluate how public bodies are contributing to this strategy.

Scottish Water has been working on this in partnership with NatureScot to help us to establish a biodiversity baseline for our landholdings and to improve biodiversity reporting and we would be happy to discuss this further. We would happily share this work with others for discussion as a step to improve public body reporting to help demonstrate how biodiversity gain is being delivered.

- The strategy could also provide useful guidance on the role of nature-based solutions to support society, address climate risk, capture carbon and increase biodiversity. A focus on the role of biodiversity and nature within public infrastructure/spaces could be very powerful – building nature and biodiversity into business as usual.

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

Please enter response here:

Scottish Water has no comment

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?

Please enter response here:

Scottish Water has no comment

About you

What is your name?

Name:

Judy Shand

What is your email address?

Email:

Regulation@scottishwater.co.uk

Are you responding as an individual or an organisation?

Organisation

What is your organisation?

Organisation:

Scottish Water

Please tell us if you are working in, or have previous experience of, an industry, employment or activity which you think is relevant to this consultation

please insert your answer in the text box:

The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:

Publish response only (without name)

We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

Yes

I confirm that I have read the privacy policy and consent to the data I provide being used as set out in the policy.

I consent

Evaluation

Please help us improve our consultations by answering the questions below. (Responses to the evaluation will not be published.)

Matrix 1 - How satisfied were you with this consultation?:

Very satisfied

Please enter comments here.:

Matrix 1 - How would you rate your satisfaction with using this platform (Citizen Space) to respond to this consultation?:

Very satisfied

Please enter comments here.: