



Scottish
Environment
LINK

5 Atholl Place

Perth

PH1 5NE

T: 01738 630804

E: enquiries@scotlink.org

W: www.scotlink.org

Edward Mountain MSP
Convener of the Net Zero, Energy and Transport Committee
Scottish Parliament

17th February 2025

Dear Convener

Thank you for the opportunity to answer questions on the general principles of the Land Reform (Scotland) Bill at Stage 1. As discussed at Committee, I am following up with additional information regarding the cost of producing a Land Management Plan.

The Scottish Government and its agencies have recognised that land use change and management **at scale** is key to strengthening our resilience to climate change, restoring natural processes, sequestering carbon and halting nature loss. While many stakeholders do have reservations about the Bill's ability to address the *concentration* of ownership in Scotland, its focus on the scale of a landholding is a prime opportunity to drive up standards across larger areas of land and do more for climate and nature.

Scotland's Third Land Use Strategy 2021-2026 states "*responsible stewardship of Scotland's natural resources delivering more benefits to Scotland's people*" as one of its key objectives. With this context, and to fulfil the wider community engagement and transparency objectives of the Bill, it should not be unreasonable for the largest landowners in Scotland, or those with the greatest concentration of power, to be required to produce and consult on a Land Management Plan outlining how they are protecting Scotland's natural assets and operating in the public interest. This is particularly important so that public money claimed by landowners of all kinds is producing optimal public benefit.

Cost and process of creating Land Management Plans

Ultimately, the cost of producing a Land Management Plan varies considerably based on the size, management objectives, complexities of a particular site and community, as well as the level of detail provided in the plan. However, the size or scale of the site does not *directly* correlate to the cost of producing and revising the Land Management Plan but rather is influenced by these wider factors.

The average cost of a Land Management Plan as set out in the Land Reform (Scotland) Bill will depend on the above factors, internal organisational processes and policies, as well as what guidance or template is issued to assist those within the scope of the Bill.

For Woodland Trust Scotland, the cost of producing a very thorough Land Management Plan is often built into the time of salaried staff such as an estate manager or factor, often already employed by large estates likely to come within the scope of the Bill. For the very simplest Woodland Trust Scotland sites, actual land



Scottish Environment LINK the voice for Scotland's environment



Registered office: 5 Atholl Place, Perth, PH1 5NE. A Scottish Charity No. SC000296

Scottish Environment LINK is a Scottish Company Limited by Guarantee and without a share capital under Company no. SC250899

manager time input can range from a few days and for sites with more complex issues and stakeholders, two weeks or more.

Some organisations may use a contractor to produce the whole plan, or to implement the work programme of a plan following its publication (e.g. protected species surveys prior to tree harvesting works). When a contractor for the plan is outsourced, some plans for smaller sites may cost in the region of £400 and others up to £6000, according to Scottish Wildlife Trust.

Revision of an existing plan, which many landowners already have, will be much less expensive and time consuming than the creation of a new plan.

RSPB contributed to this correspondence with the following information:

“It is not possible to give any exact figures as costs are variable subject to the size of the reserve, the staff involved, the type and extent of community engagement and whether it is a new plan or a revision. The planning and consultation processes can take anything from one to two weeks for a smaller reserve and many months for larger, more complex sites. We already produce management plans for our reserves and undertake community engagement so such requirements as included in the Bill would not be problematic, subject to the detail of the actual requirements and whether and how this requirement changes compared to our current processes.”

It is important to note that many estates and land-based businesses will already have management plans which may be referred to in the statutory Land Management Plan, such as Long-Term Forest Plans (for forests over 100ha) and Integrated Land Management plans for agricultural holdings, for which grant funding already exists². Some estates may also have already produced a deer management plan, either as the subject of a voluntary or compulsory control agreement, or voluntarily as an individual estate or as part of a wider Deer Management Group or landscape scale initiative.³

Large estates already undertaking a diverse range of land management activities are therefore likely to have the above plans to secure positive outcomes for their business or wider community and environmental objectives. The requirement to produce a Land Management Plan will encourage those not already using their land in the public interest to consider this more carefully. The Scottish Land Commission’s (SLC) [template](#) which was created with input from landowners may serve as an easy starting point for landholdings which do not already have a Land Management Plan.

The SLC has already been developing [case studies with a diverse range of landowners](#) on land management planning, looking at lessons learnt and good practice. Properly resourced, the Commission’s Good Practice Advisory team could play an increasingly important role in supporting land managers with good practice around producing and consulting on a Land Management Plan. This would build on the positive work done already by the Good Practice Advisory team. The Commission’s suite of protocols, tools and guidance can also assist land managers in being more proactive and aligning with future legislation.

Practical considerations

While views amongst Scottish Environment LINK members vary, some charitable landowners do have questions about how the legislative requirements would interact with charitable and business operations. For example, one Scottish Environment LINK member noted that one of their larger sites has a 20+ year management plan in place for ecological reasons. As introduced, the Bill would require that the plan is



Scottish Environment LINK the voice for Scotland’s environment

Registered office: 5 Atholl Place, Perth, PH1 5NE. A Scottish Charity No. SC000296

Scottish Environment LINK is a Scottish Company Limited by Guarantee and without a share capital under Company no. SC250899



revisited on a more regular basis than the land manager has resource for. One of our members has argued for a derogation procedure which should be allowed for to enable a longer cycle for some sites where appropriate justification is given e.g. remoteness or affected habitats/species.

In the interests of transparency for communities, we understand the need for a basic common template that could point to more in depth plans and strategies already in place. While the SLC's template may be useful for those starting from scratch or those concerned about cost, many landowners already have thorough management plan systems and processes for consultation in place. Those who have plans in place that broadly cover the required information, and especially those that are much more thorough, should be allowed to use these to meet any new duty imposed.

Public Interest Test considerations

Land Management Plans will only fulfil their purpose if they genuinely drive-up good practice and encourage land management in the public interest. I would therefore like to take this opportunity to re-emphasise the need for Public Interest Test considerations to be included on the face of the Bill. These should either feature as a wide suite of considerations at the outset of the Bill or a set of considerations for each of the relevant provisions of the Bill (Land Management Plans and lotting transfer test). The Bill should also allow flexibility for Scottish Ministers to update the public interest test considerations in the event of emerging challenges that could be addressed by land use change.

In facing the existential challenges of climate change and nature loss, setting out overarching management objectives for an estate within the scope of the Bill, outlining how the estate is contributing to **increasing** biodiversity, reducing greenhouse gas emissions, storing carbon and signposting to existing statutory plans should not be an unreasonable ask.

Yours sincerely,

Sarah Madden

Vice Convener, Land Use & Reform Group



Scottish Environment LINK the voice for Scotland's environment

Registered office: 5 Atholl Place, Perth, PH1 5NE. A Scottish Charity No. SC000296

Scottish Environment LINK is a Scottish Company Limited by Guarantee and without a share capital under Company no. SC250899

