

# Climate Change Plan call for views: summary of responses for the Land Use, Land Use Change and Forestry sector

The Net Zero, Energy and Transport Committee ran a proactive [Call for Views on the forthcoming Draft Climate Change Plan \(CCP\)](#) from 27 June to 19 September 2025. This SPICe briefing highlights key Land Use, Land Use Change and Forestry (LULUCF) sector issues raised by respondents. It is not intended to be a comprehensive summary, but a brief overview of key issues raised. Full responses are published on the Scottish Parliament website: [Published responses for Draft Climate Change Plan Scrutiny 2025 - Scottish Parliament - Citizen Space](#).

A table of acronyms used to refer to the organisations that submitted responses is included at the end of the document.<sup>1</sup>

## What are the most important policies needed to achieve the proposed carbon budgets level for 2026-40?

The responses show a high level of alignment on certain issues, particularly around the importance of peatland restoration, woodland expansion and the need for integrated land use strategies. However, there are also areas of divergence, especially in the emphasis placed on specific mechanisms, such as taxation, planning reform and biodiversity protection. There is broad agreement across both organisations and individuals on the urgency of action and the need for systemic change. Organisational responses showed general consensus on the importance of peatland and woodland restoration, but some differences in emphasis - for example, between those focused on urban greening and those focused on rural land reform.

### Woodland expansion

This theme was raised by the majority of respondents (including two individuals, Aberdeen City Council, Anderson Bell + Christie Architects, British Holiday & Home Parks Association, East Dunbartonshire Council, Future Economy Scotland, NatureScot, Royal College of Physicians, Edinburgh: Air Pollution Working Group and Climate Café (hereafter RCPE), RSPB Scotland, South Lanarkshire Council, Stop Climate Chaos Scotland (SCCS), Highland Council).

Respondents highlighted the importance of woodland expansion in achieving carbon budget targets. Some respondents were more specific, discussing various aspects of woodland expansion policy, including:

- A need for **woodlands on farms**, integrating agriculture and forestry, and using trees to e.g. provide shelter for livestock (two individuals, East Dunbartonshire Council, RCPE, RSPB Scotland, Highland Council)

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<sup>1</sup> Note: The table includes all organisations that submitted a response to the Call for Views. However, not all organisations responded to every section, and not all acronyms appear in each briefing.

- A need for **deer management policy** alongside woodland expansion policy (one individual, NatureScot, Future Economy Scotland). One individual advocated for removing subsidies for farmed deer, and that there should be a better strategy for taking advantage of venison as an “organic, free range and healthy low fat meat”. NatureScot concluded that they “believe that the Climate Change Plan would benefit from putting a much greater emphasis on reducing deer numbers to achieve its objectives for LULUCF”.
- A need for **increasing the diversity of tree species** being planted, to promote resilience (RSPB Scotland, NatureScot), and increasing the native broadleaved woodland cover (South Lanarkshire Council)
- The need to **further consider the location of tree planting**, especially on all peat soils (RSPB Scotland). RSPB Scotland notes that “there are questions about how long it takes for the carbon sequestration in new tree biomass to pay back for the loss of soil carbon during establishment”, as planting trees on organic soils (such as peat) cause some carbon loss during the planting process. They highlight that currently, the forestry industry should not be planting on peat deeper than 50cm, but question whether this is an appropriate threshold, or whether it should be more precautionary. Furthermore, the **Scottish Environment Protection Agency (SEPA) highlighted the need to look more broadly at soils**. SEPA argued, “Setting a clear direction for the protection and promotion of healthy soil through the CCP would allow both climate mitigation and wider environmental benefits to be achieved”.
- A need for **planting/restoring riparian (riverside) woodland** (South Lanarkshire Council, NatureScot).
- A need for **woodland creation targets to also encompass urban woodlands** which also deliver adaptation benefits (cooling, air quality improvements, surface water management, and health benefits). (South Lanarkshire Council, SCCS).
- Whether the **targets for tree planting account for loss of trees from storms or fires** (SCCS)

Stop Climate Chaos Scotland (SCCS) set out a list of questions which they suggested that the Committee may wish to ask the Scottish Government when scrutinising the CCP. These are:

- By how much does the Scottish Government hope to exceed past planting rates (of c.11,000ha/year) over the period covered by the CCP?
- Whether these targets will reach the Climate Change Committee (CCC) recommended 22,000ha/year by 2036, and/or by how much they will exceed this recommendation?
- What plans does the Scottish Government have, including allocation of funding, to ensure these increased rates will be achieved?

- What is the expected ambition for the division between commercial forestry and semi-natural woodland, and/or between planting and natural regeneration?
- What are the knock-on consequences for other land uses (e.g. agriculture) from these increased rates of afforestation and whether this is compatible with the Scottish Government's stated objectives for agriculture?
- What are the knock-on consequences for other policy objectives (e.g. biodiversity) from these increased rates of afforestation and how this is assessed and addressed?
- Whether the Land Use Strategy provides sufficient guidance and planning to manage the multiple objectives for land set out in the draft CCP and the Scottish Biodiversity Strategy and how, if necessary, it might be improved.

## Peatland restoration

This theme was also raised by the majority of respondents (four individuals, 2050 Climate Group, Aberdeen City Council, Anderson Bell + Christie Architects, Future Economy Scotland, NatureScot, Peat-free Partnership Scotland Advocacy Group, RCPE, RSPB Scotland, South Lanarkshire Council, Stop Climate Chaos Scotland, Highland Council, LUNZ Hub RESPECT Project (hereafter 'RESPECT project')).

Respondents highlighted the importance of peatland restoration in achieving carbon budget targets, and advocate for **continued, and often accelerated, peatland restoration**.

The RESPECT project ([a collaborative project between a number of research institutes regarding agricultural practices on peatland](#)) highlighted that while the target to restore 250,000 hectares of peatland by 2030 is a key driver, **progress has been slow**, and "particularly in relation to agricultural peatlands, requires more than a simple, area-based approach". They argued that the **policy landscape around peatlands is fragmented**, and there should be a "**shift towards outcome-based public funding**, including Peatland ACTION funding", rather than allocating funding per hectare.

NatureScot agreed that **greater ambition is required**:

"Broadly 75% of peatlands in Scotland are degraded (Evans et al, 2017). So far, 90,000 hectares have been rewetted and are on the road to recovery, which amounts to 6% of degraded peatlands. The peatland restoration target is 250,000 ha by 2030 i.e. 17% of degraded peatlands. Without much greater ambition on peatland restoration, it is difficult to see how agriculture and land use can reach Net Zero by 2045 (as the CCC envisages in the Scotland's Budget), let alone compensate for residual emissions in other sectors of the economy. The CCC foresees 45% restored by 2035 and 67% by 2045."

NatureScot suggested a **target of 1 million hectares by 2040** "including 600,000 ha rewetted plus 400,000 ha near natural, all of which would be considered 'functional' peatlands. This amounts to 50% functioning peatlands. This is on track for CCC's

recommended target in the 7th carbon budget (55% restored by 2040 is midway between the recommendation in the Scottish's Carbon Budget of 45% in 2035 and 67% in 2045)."

They also noted that there is also **no process for taking climate risks to peatlands into account**, and that "early restoration is key to making them less vulnerable to drying and associated carbon losses", and a **need to ensure coherence between peatland and woodland policies**, avoiding self-seeding trees (in particular Sitka spruce) on peatlands, and questioning restocking of forests on peat.

In addition, NatureScot noted that it is **important to "avoid new degradation of near natural bogs"**. They noted that the National Planning Framework 4 permits damage to peatlands for specific purposes but they are concerned that there is **no monitoring of peatland loss, mitigation measures, and the cumulative impact of peatland loss**.

The question of horticultural peat was also raised. The Peat-free Partnership Scotland Advocacy Group highlighted that **the commitment to make progress towards banning the sale of horticultural peat has been ongoing for five years**, and it would have expected "firmer plans and a more specific programme for legislation by now".

Several respondents raised the CCC's pathway for peatlands. SCCS noted that the **Scottish Government's indicative statement suggests it will not follow the CCC's plans in their entirety**. They urge the Committee to "scrutinise the basis, and likely outcomes, of the Scottish Government approach, exploring what targets will be set, and/or whether delivery could be improved", as well as "the knock-on consequences for other forms of land use or other sectors if the overall pathway to net zero by 2045 is to be achieved."

## **Biodiversity and ecosystem/ habitat restoration**

This theme was raised by many respondents (two individuals, 2050 Climate Group, Aberdeen City Council, Anderson Bell + Christie Architects, British Holiday & Home Parks Association, East Dunbartonshire Council, Future Economy Scotland, RESPECT project, NatureScot, RCPE, SEPA, South Lanarkshire Council, SCCS, Highland Council).

Key themes included the importance of **ensuring that climate measures, such as woodland expansion and peatland restoration, also deliver for biodiversity**, and the importance of biodiversity and ecosystem restoration beyond peatland restoration and woodland expansion.

NatureScot gave an example in **floodplain restoration** in its response. The organisation explained:

"River management strategies that aim to reconnect channels and floodplains hydrologically where possible are the most effective way to enhance carbon sequestration in a floodplain, as shown in comparisons of floodplain soil

organic carbon stock in managed versus unmanaged river and floodplains (Wohl and Pfeiffer, 2018).”

One respondent made the **link to biodiversity policy via planning and the National Planning Framework 4 (NPF4)**. South Lanarkshire Council raised that the CCP should “commit to capacity/resource building at the local authority level so that biodiversity net gain and urban forestry principles are effectively embedded in planning decisions.”

## **Land reform and wider governance**

This theme was raised by several respondents (one individual, Stirling Council, RESPECT project, Quakers in Scotland, RCPE, South Lanarkshire Council).

Respondents highlighted that **land reform policies or wider changes in governance play a key role in reaching net zero**. For example, the RCP Air Pollution Working Group argued that the CCP should

“Encourage land reform to allow more community, public and ecological stewardship of land breaking up concentrated ownership that can block climate action. Support crofters, tenant farmers, and communities to lead in nature restoration and sustainable food production.”

In relation to the broader question of governance, the RESPECT project raised the need for **new mechanisms to govern a just transition to net zero** to ensure collaboration and benefit sharing:

“Such mechanisms must make land use (decisions) more inclusive of public and community voices, ensuring fairer distribution of benefits from land use change for current and future generations.”

Both the RESPECT project and RSPB Scotland noted the piloted Regional Land Use Partnerships as a mechanism which should receive more attention, including with regard to distributing funding. On a similar theme, South Lanarkshire Council called for **resources to collaborate**, e.g. with the private sector on peatland restoration, or through regional partnerships spanning peatland and woodland restoration.

## **Integrated policies**

This theme was raised by many respondents (Aberdeen City Council, Anderson Bell + Christie Architects, BEFS (Built Environment Forum Scotland), Historic Environment Scotland, RESPECT project, RCPE, South Lanarkshire Council, SCCS, Quakers In Scotland, British Holiday & Home Parks Association).

Several respondents highlight that **integration between policies (and sometimes physically between different land uses)** is important to deliver multiple benefits and achieve climate and other goals.

At a high level, the RESPECT project and SCCS raised the need for integration between different pieces of legislation and major policies on climate change, biodiversity, land reform, land use, agriculture and so on.

Similarly, a need for **join-up between land use policy and the planning system** was raised by Anderson Bell + Christie Architects, who noted that a comprehensive policy framework should include, among other things, “land use planning: following NPF4 guidance to prioritise redevelopment of brownfield sites over greenfield development, protecting grasslands that store soil carbon and support biodiversity” and integration between carbon sequestration and land protection policies with local planning decisions.

Other respondents made more detailed or granular comments in specific areas, such as integrating urban elements of land use planning to support carbon sequestration. For example, Aberdeen City Council made **links between urban tree planting and greenspace, and water retention to manage surface water**.

BEFS and Historic Environment Scotland also emphasised the **links between the natural and historic environment**. They advocate for a need to protect historic assets as part of land use policies for the climate.

## **The need for new financial and other tools to support nature-based solutions**

Spanning woodland expansion and other nature-based carbon sequestration types, several respondents also highlighted the need for tools to be developed to provide clarity around the financial, legal and technical aspects of accounting for carbon sequestration.

Anderson Bell + Christie Architects highlighted a number of areas where administrative, legal and technical changes need to be made to support carbon sequestration efforts. These included the need for a “**National Legal Framework for Carbon Sequestration**”, which establishes “**clear legislation to define responsibilities, targets, and verification processes** for carbon sequestration across land use and forestry sectors”.

Anderson Bell + Christie Architects, RESPECT project and Stirling Council noted a need for **standardized measurement and assessment and verification tools for soil carbon**, woodland carbon and peatland carbon.

Anderson Bell + Christie Architects, as well as South Lanarkshire Council also highlighted a **need to track carbon sequestration at a local authority level via a database** of trees and woodlands. For example, South Lanarkshire Council stated that “canopy cover targets” should be “tracked and reported at local authority level, not just national woodland creation level, to ensure equity between rural afforestation and urban forestry delivery, particularly with regards to Tree Equity in more climate vulnerable communities.”

A few respondents (Aberdeen City Council, Future Economy Scotland, RESPECT project) discussed **the role of private finance and growing carbon markets**. On the one hand, Aberdeen City Council highlighted the need to **increase the use of private finance and grow the woodland carbon market**.

Others (Future Economy Scotland, RESPECT project) however, **urged caution on the use of private finance**. Future Economy Scotland, in particular, shared very detailed views on this which are summarised below.

In [recently published research](#), Future Economy Scotland disputed figures that have been published showing a £20bn “nature finance gap”. They suggested in their response to the call for views that:

“...our analysis has shown firstly, that the investment gap for woodland and peatland is likely to be less than a tenth of this, and secondly, that relying on private finance has the potential to actually deter landowners from acting and slow down progress towards net zero.”

The organisation instead proposes a “new model [for funding peatland restoration] built around the principle of public investment for public goods” where “the Scottish Government replaces the current system of up-front public grants with a new public investment model”, providing “zero-interest, income-contingent loans to cover the up-front capital costs of restoration, which would only be repaid if future revenues from carbon credit sales make them affordable”. They suggest that this would share risks and rewards fairly between the public and land managers. In addition, landowners would receive annual operating payments for the first 15 years of the project, and a proportion of the annual net profits would be ring-fenced for local community benefits.

Likewise, the RESPECT project advocated for the “robust regulation of private finance and natural capital markets” as opposed to the current approach which relies on voluntary action “shaped by unregulated market dynamics”. They conclude:

“Policies are needed to regulate voluntary carbon and nature markets to ensure projects deliver genuine, lasting climate, ecological and social benefits and do not simply serve as a mechanism for ‘moving money around’. This includes establishing clear legal responsibilities and liabilities for project delivery, especially in complex collaborations which require the setting up of new companies.”

Future Economy Scotland also pointed to the **need to make changes to the tax system**, which, it argues, currently encourages “inefficient and unsustainable land use, deepening inequalities, and missing key opportunities to raise public revenue”. They argue that the Scottish Government should:

- Have a long-term ambition to replace non-domestic rates with a “green Land Value Tax (LVT) for all rural land. This would involve levying a recurring tax based on the market value of land, but applying discounts based on an Energy Performance Certificate (EPC)-equivalent rating for land use based on estimated carbon emissions and wider ecological impact”.
- Explore introducing a “Delayed Degraded Peatlands Tax” – an annual tax on peatlands in different states of degradation to come in in ten years’ time, “providing landowners sufficient time to commence the process of restoration, or sell their land to someone else who will.”

- Explore implementing a “narrower tax on degraded peatlands” more quickly.

One individual as well as Quakers in Scotland, also highlighted the need for changes to Scotland’s land taxation system and inheritance laws, noting specifically a land value tax.

## When should these policies be introduced, and over what timeframe should they be implemented?

The majority of respondents expressed a sense of urgency that measures should be **introduced as soon as possible, immediately, or be rapidly scaled up** (three individuals East Dunbartonshire Council, RESPECT project, NatureScot, Stirling Council, Peat-free Partnership Scotland Advocacy Group, RCPE, RSPB Scotland, South Lanarkshire Council, SCCS, Aberdeen City Council, British Holiday & Home Parks Association).

Particularly, respondents noted the **timescales for new woodlands to begin to sequester carbon and the timescales for peat to form**. A few respondents (NatureScot, RSPB Scotland, South Lanarkshire Council) highlighted that more mature trees sequester more carbon, so woodland expansion needs to happen now to contribute to emissions reductions in 2026-40. RSPB Scotland stated: “The best time to plant a tree was twenty years ago, the next best time is right now.”

NatureScot set out a **plan for how to prioritise areas for tree planting over time**, considering that planting new trees on different types of soils affect when net carbon sequestration can be expected. They explain:

“The extent of organic and organo-mineral soils in Scotland poses a particular problem to woodland expansion through planting, as soil disturbance in these soils result in emissions (e.g. Friggens et al, 2020), which then delay the sequestration potential of woodlands (Matthews et al, 2020; Baggio-Compagnucci et al, 2022)... Calculations made using the Woodland Carbon Code methodology suggests that even with low disturbance soil preparation, in the first 15 years woodlands will be net emitter of carbon dioxide. If Scotland is to play its part in limiting the risk of climate overshoot, it is problematic to generate additional emissions for gaining sequestration after 2040. For this reason, we believe that **in the next 15 years new woodlands through planting should be directed towards the poorer mineral soils with a lesser proportion planted on organo-mineral soils**. There is potential in the uplands for planting of woodland on the drier elements of the soil mosaic – crags, steep slopes, bracken areas and burnside. In some cases, such planting may help to stabilise slopes and reduce the risk of landslides on to critical infrastructure” (emphasis added).

Furthermore, “consideration of resilience, especially in relation to climate risks, needs to happen now, as due to the long lifecycle of trees, decisions taken now have implications for woodlands over decades”.

Similarly for peatlands, respondents advocated for rapid peatland restoration to prevent peatland emissions, and to start new peat formation. South Lanarkshire

Council stated that “it takes 1000 years to grow 2 metres of peat, so the time to protect and restore our peatland is now”.

Many respondents offered **specific suggestions for timescales** (one individual, Quakers in Scotland, Aberdeen City Council, Anderson Bell + Christie Architects, British Holiday & Home Parks Association, Climate XChange, NatureScot, Public Health Scotland, Highland Council).

## What are the expected costs of implementing these policies?

Several respondents highlighted that the **costs of inaction are high** and that the costs of acting should be compared to the future cost of not acting, or otherwise emphasised that it is less costly in the long-term to act now (NatureScot, Stirling Council, RCPE, South Lanarkshire Council, SCCS)

For example, RCPE highlighted the health costs of not acting, and SCCS pointed to recent research which has shown the costs of action compared to the costs of inaction:

“a recent OBR [Office of Budget Responsibility] report shows very clearly that the cost of cutting emissions to net-zero is significantly smaller than the economic damages of failing to act. The costs and risks of inaction have also been highlighted by the Institute and Faculty of Actuaries, demonstrating that the cost of inaction should be scrutinised carefully, whether in terms of the cost to the economy or any estimates of increase in government spending.”

In terms of the costs of action, some respondents raise that there are **expected to be up-front costs or initial investment**, for example, in legislation, monitoring and data infrastructure (Anderson Bell + Christie Architects), such as in establishing a “high-integrity market” for carbon credits (RESPECT project). The RESPECT project also noted that there are upfront costs associated with transaction and capacity building, e.g. collaboration, legal advice and administration, and public funds are needed to cover these upfront costs to be able to include smaller actors.

However, Anderson Bell + Christie Architects suggest that these **costs are offset** longer term by avoided carbon penalties, increased resilience, and economic opportunities in restoration, forestry and monitoring.

In addition, two other respondents note that there is also a **need for funding for ongoing maintenance** (British Holiday & Home Parks Association, South Lanarkshire Council). South Lanarkshire Council said:

“Evidence from WIAT (Woods In and Around Towns) programmes shows that without ring-fenced maintenance budgets, canopy expansion projects underperform and that consistent community engagement and management funding deliver far higher resilience and public benefits over decades.”

Returning to the point about policy integration for land managers, the RESPECT project also highlights that there may be opportunity costs for land managers from taking part in restoration (e.g. affecting eligibility for agricultural payments),

concluding that “an **integrated funding system** needs to be designed to mitigate this.”

Two respondents made **specific points in relation to peatland restoration costs**.

Climate Xchange pointed to its [recent research which found that costs per hectare vary significantly](#) depending on site characteristics, funding availability and environmental designations.

Future Economy Scotland has costed the model it set out in response to Question 1:

“Taken together, we find that the maximum cost to the state of the public investment for public good model would only require an additional £40m a year if no loans were paid back, amounting to only 0.1% of the Scottish Government’s annual budget. In contrast however, if carbon prices rose and grants were paid back in full, it would end up costing 46% less than the current grant-funding model due to our clawback mechanism. Just over half of all grants would need to be paid back for this model to cost no more to the Scottish Government than the current status quo. Crucially, we find that even if loans are paid back and benefits shared with communities, profits for landowners could still be higher than under a private-finance led approach, due to the absence of paying investor returns at commercial rates.”

Finally, Highland Council’s response suggests that **different areas might face different costs**: “Costs are higher in the Highlands, but a fair model must value co-benefits such as flood prevention and biodiversity resilience, not just tonnes of carbon.”

## What are the expected benefits of these policies?

**Increase in carbon sequestration and reduction in emissions** was the most frequent benefit raised (including one individual, Aberdeen City Council, British Holiday & Home Parks Association, RESPECT project, RCP Air Quality Working Group, RSPB Scotland, South Lanarkshire Council, SCCS, Highland Council).

Other benefits raised included:

- **Improved health** or avoided risks to health from climate change (three individuals, Aberdeen City Council, Public Health Scotland, Anderson Bell, British Holiday & Home Parks Association, East Dunbartonshire Council, Stirling Council, RCPE, South Lanarkshire Council, SCCS, Highland Council).
- **Wildfire reduction** (one individual, Highland Council).
- **Resilience** in terms of improved soil health, water retention, flood prevention, or air quality (three individuals, Aberdeen City Council, Anderson Bell, British Holiday & Home Parks Association, East Dunbartonshire Council, RESPECT project, NatureScot, Stirling Council, South Lanarkshire Council, Highland Council).

- **Economic opportunities from climate change measures** (e.g. new types of jobs, private sector investments, new resources like a sustainable timber supply, tourism) (two individuals, Aberdeen City Council, Anderson Bell, Future Economy Scotland, Stirling Council, RCPE, RSPB Scotland, SCCS, Highland Council).
- **Biodiversity and ecosystem benefits** (One individual, Aberdeen City Council, East Dunbartonshire Council, RESPECT project, NatureScot, Stirling Council, Peat-Free Partnership, RSPB Scotland, South Lanarkshire Council, SCCS, Highland Council).
- **Enhancing community wellbeing, fairness and equity** with the right policy designs (Anderson Bell + Christie Architects, RESPECT project, Public Health Scotland, RCPE, Highland Council).
- In an urban context, **multiple benefits**, such as greening can help reduce cooling needs, provide greenspaces (Anderson Bell, Public Health Scotland, South Lanarkshire Council).

However, many respondents raised in various ways that these benefits are not a given and **require thoughtful policy design and monitoring and verification**.

For example, both Historic Environment Scotland and the RESPECT project highlight the need to consider heritage and the historic environment in land use activities for climate change mitigation. Public Health Scotland similarly highlighted that to accrue health benefits, policies have to be designed with this in mind:

“We would advocate for the use of HIA to identify and assess potential health and health equity impacts of proposed policy [8]. Policy monitoring and evaluation frameworks should also include health and health equity metrics.”

## What do you think the key challenges would be in delivering these policies?

Many respondents raised that **overcoming resistance from landowners, and other cultural and behavioural barriers** (such as concentrated land ownership) are significant challenges. (two individuals, Quakers in Scotland, Anderson Bell + Christie Architects, Future Economy Scotland, RESPECT project, NatureScot, Highland Council, Stirling Council, Peat-free Partnership Scotland Advocacy Group, RCPE).

NatureScot highlighted that because agriculture and LULUCF are different sectors for the purposes of the inventory, the interplay between these emissions become less visible. They said:

“Unless farmers are encouraged to see permanent habitats as potential inseting options for their business, they may resist engagement in nature restoration that protects and enhance carbon stores.”

RSPB Scotland also made the link between LULUCF and agriculture, suggesting that **one of the challenges to achieving land use objectives is agriculture policy**. The organisation said:

“the biggest blocker of desirable land use change, such as enhanced woodland creation, is agricultural policy”.

They argued that, despite the Scottish Government desiring change, the direction of travel for the new policies for agriculture “looks substantially like the status quo...this public financial support acts like an anchor on the industry; it effectively discourages innovation and prevents change.”

Other frequently mentioned challenges included **funding and investment, skills and capacity and scientific uncertainty**.

On **funding and investment** (mentioned by Aberdeen City Council, Anderson Bell + Christie Architects, Public Health Scotland, RCPE, RESPECT project, South Lanarkshire Council, Highland Council), respondents highlighted this in relation to the need for significant funding in the context of strained finances. The RESPECT project and Highland Council also noted challenges with the carbon market. The RESPECT project also raised that “an increasing emphasis on private markets to deliver public goods is a significant challenge. Without robust governance, this approach risks prioritising economic opportunity over strategic land use, may not deliver genuine ecological outcomes, and can exacerbate social inequalities by favouring large, simple projects over smaller, more complex ones.”

Highland Council raised similar issues:

“Without strong governance, the Highlands risk becoming a carbon sink for external investors, with little local benefit or adaptation resilience.”

On **skills and capacity** (mentioned by Aberdeen City Council, Anderson Bell + Christie Architects, Public Health Scotland, RCPE, South Lanarkshire Council, Highland Council), respondents raised, among other things, workforce shortages and shortages of specialist expertise within councils. Future Economy Scotland outlined in detail how this impacts the forestry and peatland restoration sectors.

On **scientific uncertainty** (mentioned by Aberdeen City Council, Anderson Bell + Christie Architects, NatureScot, Public Health Scotland, and South Lanarkshire Council), respondents highlighted that uncertainties impact land management decisions, and there are also uncertainties regarding the impacts of climate change itself and the potential unintended consequences that can result (e.g. climate change causing conditions such as drought or flood which could prevent trees from growing or peatlands from recovering). In relation to trees, NatureScot highlights a need to “hedge bets”, making it “essential to have greater diversity in our woodlands”.

Further challenges mentioned included, among other things:

- Developing robust tools and mechanisms for **monitoring, enforcement, and data collection** (one individual, Quakers in Scotland, Aberdeen City Council, Anderson Bell + Christie Architects, NatureScot, South Lanarkshire Council).

- **Competing demands for land** (and potential tensions between different outcomes) (Aberdeen City Council, Anderson Bell + Christie Architects, British Holiday & Home Parks Association, NatureScot, Public Health Scotland, RCPE, South Lanarkshire Council, Highland Council).
- **Support for smaller landowners/actors** (one individual, British Holiday & Home Parks Association, RESPECT project).
- Meaningful and effective **community engagement and benefits** (one individual, Aberdeen City Council, RCPE).
- The required **scale and pace of change** (Aberdeen City Council, Public Health Scotland).
- Policy and regulatory **coordination at different scales** (Anderson Bell + Christie Architects, RESPECT project, Stirling Council, RSPB Scotland).
- **Deer management** (Future Economy Scotland, NatureScot).

The RCPE summarised their view that:

“Overcoming these challenges will require bold land reform and community empowerment, long-term funding tied to public health outcomes, better collaboration between climate, biodiversity and health sectors, and a focus on fairness, access, and shared stewardship of Scotland’s land.”

## How could these policies support a Just Transition for workers and communities?

Many respondents to this question raised that the **just transition should be prioritised through community ownership and/or participation in land management decisions** (one individual, Quakers in Scotland, Aberdeen City Council, RCPE, South Lanarkshire Council, Public Health Scotland, Highland Council, NatureScot, SCCS).

One individual argued that:

“a just transition requires moving beyond market-based solutions that maintain existing power imbalances toward systemic reforms that redistribute both land ownership and decision-making authority.”

To support a just transition for communities, Future Economy Scotland suggested ring-fencing a proportion of annual net profits (e.g. 20%) for local community projects.

The RESPECT project, RCPE and NatureScot referred to **a need to achieve justice on different levels and within different policy areas**. NatureScot stated that:

“A just transition therefore involves the following forms of justice: distributive, procedural, recognitional, multispecies and intergenerational including restorative justice.”

The RESPECT project suggested that we currently do not have a measure of success for a just outcome:

“in relation to peatlands, the Draft Just Transition Plan for the land use and agricultural sectors only refers to achieving ‘[h]ectares of restored peatland in Scotland per year’ as a measure of success, which is an inadequate indicator for achieving just processes and outcomes.”

RCPE raised that to be just, policies need to be considered through different lenses:

“All policy proposals should be assessed through a health, equity, and wellbeing lens, not only a carbon lens...Land use can deliver not only Net Zero, but also dignity, healing, and opportunity if communities are trusted as stewards, workers are valued, and policies are designed to lift health and wellbeing alongside the carbon balance.”

Many respondents highlighted that **investment in training and education, and the development of a skilled workforce** will be key to a just transition (one individual, Aberdeen City Council, ClimateXChange, RCPE, Future Economy Scotland, Stirling Council, RSPB Scotland, Quakers in Scotland).

Future Economy Scotland recommended that the Scottish Government increase funding for the skills transition and provide early indication of funding.

A few respondents also raised the need for **a just transition for specific areas**. South Lanarkshire Council highlighted that there must be a just transition for urban communities as well as rural ones, with opportunities within urban forestry. And Highland Council noted that “a Just Transition means Highland communities see local food, jobs, flood protection, and fair revenues, not just carbon credits.”

Other ways to support a just transition included **ensuring access to finance for small actors** and **providing support for vulnerable groups and groups which may have specific legal and governance needs** (such as crofters) (Aberdeen City Council, British Holiday & Home Parks Association, RESPECT project, Future Economy Scotland). The RESPECT project noted:

“An integrated public funding system that is accessible to all landholders, regardless of scale and ownership structures, must ensure that the benefits of the transition are distributed more fairly. By providing public funding for transaction costs and capacity building, the policies would actively address the barriers faced by smaller farmers, tenants, and crofters.”

**Anna Brand, Senior Researcher, SPICe**

**4 November 2025**

## Table of acronyms used to refer to organisations

<b>Acronym</b>	<b>Full form of respondent</b>
C2050	2050 Climate Group
ABCA	Anderson Bell & Christie Architects
ACC	Aberdeen City Council
AGS	Auditor General for Scotland
ALLIANCE	Health and Social Care Alliance Scotland
BE-ST	Built Environment Smarter Transformation
BEFS	Built Environment Forum Scotland
BHHPA	British Holiday & Home Parks Association
CCAN	Cardross Climate Action Network
No acronym used	Climate Cafe Shetland
CEP	Centre for Energy Policy, University of Strathclyde
CERG	Climate Emergency Response Group
CIAT	Chartered Institute of Architectural Technologists
CITB	Construction Industry Training Board
No acronym used	Colleges Scotland
CreScot	Creative Scotland
CS	Consumer Scotland
No acronym used	Culture for Climate Scotland
CXC	ClimateXChange
No acronym used	Cycling UK
No acronym used	Edinburgh Communities Climate Action Network
EDC	East Dunbartonshire Council
EHA	Existing Homes Alliance
EMEC	European Marine Energy Centre
EST	Energy Saving Trust
FDFS	Food and Drink Federation Scotland
FES	Future Economy Scotland
FOES	Friends of the Earth Scotland
GCC	Glasgow City Council
GGM	Get Glasgow Moving
HC	Highland Council
HES	Historic Environment Scotland
HfS	Homes for Scotland
IKEA	IKEA Ltd
IPPR Scotland	Institute for Public Policy Research Scotland
No acronym used	Liquid Gas UK

No acronym used	Logistics UK
RESPECT project	LUNZ Hub RESPECT Project
MCS	The MCS Foundation
NECCUS	North East Carbon Capture Utilisation and Storage
NESTRANS	Nestrans (Regional Transport Partnership for Aberdeen City & Aberdeenshire)
NHS Lothian	National Health Scotland Lothian
NFUS	National Farmers Union Scotland
NS	NatureScot
No acronym used	Nourish Scotland
No acronym used	Orkney Islands Council
No acronym used	Paths for All
No acronym used	Peat-free Partnership Scotland Advocacy Group
PHS	Public Health Scotland
No acronym used	Perth and Kinross Council
No acronym used	Propertymark
PS	Police Scotland
QS	Quakers in Scotland
QMS	Quality Meat Scotland
RCPE	Royal College of Physicians Edinburgh: Air Pollution Working Group and Climate Café
RICS	Royal Institution of Chartered Surveyors
RMT	National Union of Rail, Maritime and Transport Workers
RSPB Scotland	Royal Society for the Protection of Birds Scotland
SAP	Scottish Agroecology Partnership
SC	Scottish Care
SCCS	Stop Climate Chaos Scotland
SE	Scotland Excel
SCIS	Scottish Climate Intelligence Service
SEDA	Scottish Ecological Design Association
SEPA	Scottish Environment Protection Agency
SEStran	South East Scotland Transport Partnership
SF	Stockfree Farming
SLC	South Lanarkshire Council
SPT	Strathclyde Partnership for Transport
SRAEHL	Scottish Research Alliance for Energy, Homes and Livelihoods
No acronym used	Seafood Scotland
SSN	Sustainable Scotland Network

StC	Stirling Council
SuSc	Sustrans Scotland
SWA	Scottish Wholesale Association
TACTRAN	Tayside and Central Scotland Transport Partnership
No acronym used	Transform Scotland
UKERC	UK Energy Research Centre
UoGSoL	University of Glasgow, School of Law
UWE Bristol	University of the West of England Bristol
WWF Scotland	World Wide Fund for Nature Scotland