



Scotland's oldest and only volunteer-run wild land charity

Our response to the document:

Scotland 2045 - fourth National Planning Framework - draft: consultation

Part 1 - A National Spatial Strategy for Scotland 2045

Q 5: DO YOU AGREE THAT THE SPATIAL STRATEGY WILL DELIVER FUTURE PLACES THAT OVERALL ARE SUSTAINABLE, LIVEABLE, PRODUCTIVE AND DISTINCTIVE?

A major omission from this first section of the NPF is any mention of the importance of Scotland's landscape. The current text is:

“Scotland has a rich and high quality natural and historic environment. ... safeguard our shared heritage for future generations”

This is very weak and we would suggest something similar the following:

“Scotland is renowned for its scenic splendour, which includes landscapes of wild mountains, moorlands, lochs, rivers, coasts and islands. Its scenery provides inspiration to both locals and visitors alike, in addition to being the wellspring of the tourist industry. Its best landscapes are worth the highest level of protection so that they are still there for future generations to enjoy, and development needs to be sensitively sited to avoid damaging this internationally valued asset.”

There needs to be something in NPF4 about the role of landscape designations in maintaining these 'distinctive places', additional to the statements in Policy 32. The importance of National Parks, National Scenic Areas, Wild Land Areas, local landscape designations, and Conservation Areas in safeguarding valued landscapes/townscapes needs to be highlighted. They all have identified 'special qualities' and there needs to be guidance on how these are to be used to maintain the different distinctive landscapes across Scotland.

North and west coastal innovation

Q 8: DO YOU AGREE WITH THIS SUMMARY OF CHALLENGES AND OPPORTUNITIES

FOR THIS ACTION AREA?

The text states “The area benefits from an exceptional environment with coastal and island landscapes that are an important part of Scotland’s national identity.” [first mention of landscape in the NPF]

But there is no indication of how these landscapes are to be safeguarded for future generations. What is the role of NSAs, WLAs and New National Parks? [as both a conservation and job-providing tool]? Maps needed to show key landscapes.

Northern revitalisation

Q 10: DO YOU AGREE WITH THIS SUMMARY OF CHALLENGES AND OPPORTUNITIES FOR THIS ACTION AREA?

“The Highlands of Scotland, together with Moray and parts of mainland Argyll, are world renowned for their stunning landscapes, rich biodiversity and cultural heritage ... The area’s environmental quality, landscape and wildlife sustain key economic sectors including tourism, food and drink, distilling and clean energy.”

Recognition here of the value of landscapes, but again there is no mention of how they are to be safeguarded. The role of NSAs, WLAs, NPs not mentioned. Maps are needed to show the key landscapes: NSAs, NPs, WLAs.

National Spatial Strategy

Q 18: WHAT ARE YOUR OVERALL VIEWS ON THIS PROPOSED NATIONAL SPATIAL STRATEGY?

As stated above, there is nothing about how the iconic and other valued landscapes of Scotland are to be safeguarded for future generations to enjoy. The landscapes around us contribute to the essence of Scotland, but the quality of many is deteriorating.

Part 3 - National Planning Policy

Policy 1: Plan-led approach to sustainable development

Q 23: DO YOU AGREE WITH THIS POLICY APPROACH?

Yes. However The lack of consideration of landscapes is major omission in the draft.

The following text (or similar) from current planning guidance needs to be carried over to NPF4 to emphasise the importance of wild land and Wild Land Areas: it is not there at present:

From NPF3:

4. A natural, resilient place

4.4 We also want to continue our strong protection for our wildest landscapes – wild land is a nationally important asset.

From SPP2 (2014)

Development Plans

91. Plans should safeguard unspoiled sections of coast which possess special environmental or cultural qualities, such as wild land.

200. Wild land character is displayed in some of Scotland's remoter upland, mountain and coastal areas, which are very sensitive to any form of intrusive human activity and have little or no capacity to accept new development. Plans should identify and safeguard the character of areas of wild land as identified on the 2014 SNH map of wild land areas.

Q 27: DO YOU AGREE THAT PLANNING POLICY SHOULD SUPPORT COMMUNITY WEALTH BUILDING, AND DOES THIS POLICY DELIVER THIS?

The issue sometimes arises that the local community are opposed to a particular development in their locality, but the development is given the go-ahead by central government after a public inquiry. There is an issue here which needs addressing.

Policy 19: Green energy

Q 40: DO YOU AGREE THAT THIS POLICY WILL ENSURE OUR PLACES SUPPORT CONTINUED EXPANSION OF LOW CARBON AND NET-ZERO ENERGY TECHNOLOGIES AS A KEY CONTRIBUTOR TO NET-ZERO EMISSIONS BY 2045?

This policy makes no mention that 'green-on-green' conflicts can arise, for example that between renewable energy infrastructure and conserving the landscape, particularly the wildness of the Scottish hills. The policy needs to give greater guidance on the siting of energy infrastructure. There needs to be a map-based approach, with NPs, NSAs and Wild Land Areas (and associated buffer zones) as no-go areas for large projects. It needs to be same as the approach suggested in Policy 32 for Natural places. Likewise, there needs to be a statement as in the Minerals Policy 22 "to minimise the impact of renewable energy schemes on the environment." This would ensure consistency in the NPF.

The policy needs to relate to the content of the current planning guidance:

4.4 We also want to continue our strong protection for our wildest landscapes – wild land is a nationally important asset. (SPP2)

200. Wild land character is displayed in some of Scotland's remoter upland, mountain and coastal areas, which are very sensitive to any form of intrusive human activity and have little or no capacity to accept new development. Plans should identify and safeguard the character of areas of wild land as identified on the 2014 SNH map of wild land areas. (NPF3)

Policy 28: Historic assets and places

Q 46: DO YOU AGREE THAT THIS POLICY WILL PROTECT AND ENHANCE OUR HISTORIC ENVIRONMENT, AND SUPPORT THE RE-USE OF REDUNDANT OR NEGLECTED HISTORIC BUILDINGS?

There needs to be a similar policy to this on Scotland's designated landscapes (NPs, NSAs, WLAs, local landscape designations).

Policy 31: Rural places

Q 49: DO YOU AGREE THAT THIS POLICY WILL ENSURE THAT RURAL PLACES CAN BE VIBRANT AND SUSTAINABLE?

“b) Development proposals that support the resettlement of previously inhabited areas should be supported.” Why? How long ago? 1950? 1850? 1750? 1650? 1050? Certainly politically in tune, but surely it only creates more problems of sustainability and transport? Is it not best to concentrate on existing communities in decline?

Policy 32: Natural places

Q 50: DO YOU AGREE THAT THIS POLICY WILL PROTECT AND RESTORE NATURAL PLACES?

We commend the aims as set out in the preamble to Policy 32, specifically the need for the planning system to "protect, restore and enhance Scotland's natural assets". However, we do not believe the policy is strong enough to protect Scotland's superb wild places and landscapes. We note that there is little mention in NPF4 of Scotland's Wild Land Areas, as defined and mapped by NatureScot in 2014, and recognised in NPF3. We believe this is a serious omission, and will inevitably lead to weakening the existing imperfect protection of these very important areas.

Wild Land is one of Scotland's most important assets. It is rare or absent in much of the rest of the UK, and indeed in many of the countries in Western Europe, and faces increasing challenges even in Scotland from the pressures of development. It is valuable for all of Scotland's people and visitors, providing spaces where one can experience the wildness of nature and appreciate the true natural landscape, free from human interference and intrusions.

We believe Policy 32 d) should be strengthened by including Wild Land Areas in the list of areas referred to, and that there should be a clear presumption against any development proposals in these areas. Wild Land Areas are at least of equivalent importance as NSA's and NNR's, in terms of their national value and vulnerability to development. They should enjoy equal protection.

Policy 32 i) applies specifically to Wild Land Areas, and this is welcome, but should be stronger, in that major developments immediately adjacent to the boundaries of a Wild Land Area can have a seriously detrimental effect on the landscape quality in the WLA, and around it. There should be buffer zones of protection around WLA's in which development should not be permitted if this would affect the landscape or wild quality of land within the WLA. Such buffer zones will vary in size and width, depending upon the landscape and visibility around the WLA.

Further, Policy 32 i) makes no specifications about the type or importance of any development proposals - it requires only that "the proposed development cannot reasonably be located outside of the .. WLA". This could allow major developments which are specifically targeted upon a particular river, mountain or loch, without justification. Whilst allowing the possibility of small locally focussed developments as noted above, there should be an over-riding restriction on larger developments to those of clearly national importance only, where other locations are impractical.

A recent Report commissioned by the Scottish Wild Land Group (The State of Wild Land in the Scottish Highlands - Wild Land Research and Ian Kelly Planning Consultancy, 2022 -

www.swlg.org.uk) shows the effects of this. In its Summary (para 203) it concludes "... recent and current planning policy provisions at national and local level have not prevented the continuing attritional loss of wild land whilst wind farm applications continue to be random, speculative proposals that are followed by often inconsistent decision making that is characterised by one person's views in each case. There is an absence of positive and consistent Plan led planning."

Wild Land Areas need to be given stronger legal underpinning, to halt the decline of their special qualities. NPF 4 must not allow the protection and restoration of Wild Land Areas either to be watered down or abandoned.

Policy 34: Trees, woodland and forestry

Q 52: DO YOU AGREE THAT THIS POLICY WILL EXPAND WOODLAND COVER AND PROTECT EXISTING WOODLAND?

The role of trees in mitigating climate change by storing carbon is grossly overplayed. Certainly on low-carbon soils the presence of trees will take carbon out of the air, but only temporarily until they are felled or blow over: so certainly of interim help. However on many carbon-rich upland soils, trees are likely to have a negative or neutral effect on carbon sequestration (see my answer to Qu.51). If the reduction in albedo from creating a three-dimensional, dark tree canopy is taken into account, this makes the benefits of trees even more dubious: it results in local warming. Climate is impacted by both the amount of atmospheric carbon (and other greenhouse gases) and the albedo (reflectivity) of the land. More research is needed on this subject.

Woodlands in Scotland can never be very resilient, climate change or not, owing to their sensitivity to grazing, natural soil deterioration, and their tendency to blow over. Likewise woodlands are unlikely to prevent extreme flood events which do the most damage.

Additionally, all the evidence suggests that most Scottish native woodland, particularly in the Highlands, has been undergoing a long-term decline over the past 4,000-7,000 years, as would be expected in this, the oligocratic phase of an interglacial. Hence a biodiversity characteristic of the upland landscape is 'isolated woodland'. Increasing woodland cover is, therefore, reducing the biodiversity value. Therefore, in many instances, it is not true to say that adding trees to the landscape 'benefits the biodiversity'; they certainly add to the 'diversity' of the landscape, but reduce the naturalness of the landscape. At a global level, conserving biodiversity means conserving the natural characteristics of each part of the planet which, for much of Scotland, means open moorland and bog, with disjunct woodland. Creating a new woodland network in the uplands in fact fragments an existing moorland network (both are 'nature networks').

The policy needs to discriminate between the Highlands and the Lowlands: there is no one size fits all. Where most of the landscape is already relatively natural, then new woods can reduce the naturalness. Where most of the landscape has lost most of its natural habitats (principally the lowlands), then new woodlands can provide many benefits.

The forestry policy needs to take account of the fact that commercial forestry is an industrial process, involving, amongst other things, the creation of engineered vehicle tracks. Hence the policy needs to relate to Policy 32 with respect to wild land, because new forestry is antithetical to the conservation of wild land.

Part 5 – Annexes

Annex C

Q 58: DO YOU AGREE WITH THE DEFINITIONS SET OUT IN THE GLOSSARY? ARE THERE ANY OTHER TERMS IT WOULD BE USEFUL TO INCLUDE IN THE GLOSSARY?

Suggest the addition of ' Wild Land Area' as per SPP2:

“The wildest areas of Scotland, as mapped by NatureScot, showing minimal signs of human influence: they may include mountains, moorland, undeveloped coastline or peat bog.” [the definition from SPP2]

Need also to add NSAs: “Scotland’s finest landscapes”

Perhaps include all land/see designations, nature, landscape & historic environment?

Jonathan Binny
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Scottish Wild Land Group:

www.swlg.org.uk

Report : The State of Wild Land in the Scottish Highlands :

www.swlg.org.uk/news.php#state-wild-land