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Dear Sir or Madam

Response to Interim Consultation on Scotland's Fourth National Planning Framework Position Statement

Ramblers Scotland welcomes the opportunity to respond to the interim consultation on the NPF4 position statement. We have supported the response from Scottish Environment LINK, so our more detailed additional comments here relate to our specific interests which are not fully covered in the LINK document.

We are the representative body for walkers in Scotland, recognised by **sportscotland** as a governing body of sport. We help everyone, across Scotland, enjoy walking and protect the places we love to walk. We are a membership organisation with 54 local walking groups in Scotland, running 3,500 group walks a year which are led and organised by 1,200 volunteers.

There is much to welcome in this position statement in its recognition of the need for the planning system to play its role in transforming the way our land is used, and reflecting the need to deliver on a range of outcomes, from the climate emergency and biodiversity to public health and a green recovery after the Covid-19 pandemic.

1. Do you agree with our current thinking on planning for Net Zero Emissions?

We support the proposal to integrate land use and transport, with the promotion of the National Transport Strategy 2 sustainable transport hierarchy. Nevertheless, we should point out that a prioritisation approach similar to this hierarchy has existed in Scottish Government planning policy since at least SPP17 published in 2005 without fundamentally changing the way new developments are planned, so it is important to consider how this hierarchy can actually become embedded in the development planning system.

We support the intention to update the current spatial framework for onshore wind to protect National Parks and National Scenic Areas. However, the development of new/repowered renewables outwith these areas can still have an impact on important public benefits such as special environmental or cultural qualities of a landscape, or on deep peat and carbon rich soils. We reiterate the policy principle from Scottish Planning Policy which we would like to see retained:

28. The planning system should support economically, environmentally and socially sustainable places by enabling development that balances the costs and benefits of a proposal over the longer term. The aim is to achieve the right development in the right place; it is not to allow development at any cost.

2. Do you agree with our current thinking on planning for resilient communities?

We are pleased to see the recognition that planning has a role to play in improving public health and wellbeing.

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As alluded to above, we are fully supportive of the vision for more sustainable travel. To achieve this vision, we would refer you to our proposal for a national development – a National Walking and Cycling Infrastructure. This is an ambitious, transformative proposal which calls for Scotland's path network to be identified, mapped, expanded and promoted as a strategic national infrastructure project on a par with the public road network in terms of planning and investment. This path network will provide rural and urban options for walking, wheeling and cycling both for transport and leisure use, including tourism, and help to support a re-adjustment towards more sustainable, local economies, reduced inequalities and improved public health. This development is based on a significant expansion and adjustment over a 10 year period (2021-2031) of the existing NPF3 National Walking & Cycling Network.

In our submission we also drew attention to Paris's 15-minute neighbourhood concept and so we are pleased to see that the idea of creating 20-minute neighbourhoods is now included in this position statement.

We fully support the policy changes set out with regard to blue and green networks. The Covid-19 pandemic has demonstrated the importance to our health and wellbeing of having accessible, good quality greenspaces in our towns and cities, as well as ensuring safe, pleasant link routes to the green belt and the wider countryside. However, it is crucial that this access is equitable – we are aware that there is currently a huge issue of inequality of access to the outdoors leading to poorer outcomes. This is shown by evidence that people living in the most deprived areas of Scotland [visit the outdoors less often](#) than in the least deprived areas (45% visit once a week as compared to 68% in more affluent areas). The wealthiest fifth of adults are [three times more likely to hillwalk](#) or ramble than the poorest fifth.

As well as benefits to health, outdoor recreation makes a vital contribution to the nation's economy, particularly in rural areas; these activities can play an important role in supporting a green economic recovery strategy.

Given this recognition of the importance of a natural environment, we would like to take the opportunity to flag up that rights of public access are currently included within SPP and we would strongly urge that this aspect is retained in the new NPF4/SPP. The specific references include paragraphs 29 and 221.

3. Do you agree with our current thinking on planning for Well Being Economy?

We support the proposal to support sustainable tourism development. However, it is crucial that infrastructure and facilities are expanded in a way which doesn't bring further longer term problems and few benefits for the local community, for example by enabling large new attractions to be established which are designed around the needs of private car drivers and not reflective of the needs of the local community.

Scotland's natural and cultural heritage is a huge draw for visitors, and our landscapes are a fantastic setting for outdoor recreation. The value of outdoor recreation by Scottish residents is approximately [£2.6 billion each year](#). This economic activity supports many small scale businesses, such as cafés, accommodation, shops and hire centres, outdoor instructors and transport providers, particularly in rural areas. Recreation is a vital component of our tourism industry with VisitScotland estimating that walking tourism alone contributes [£1.26 billion to the economy](#). This is generally sustainable, low-impact activity and there is much potential for growth without damaging our environment, especially in rebuilding the tourism sector post-Covid-19.

The experience of summer 2020 demonstrated numerous problems, such as irresponsible camping, parking and toileting, which were largely due to the lack of visitor infrastructure or management. It is important that any constraints within the planning system which cause

difficulties in addressing these issues are resolved, for example to enable the creation of small scale overnight campervan facilities in existing car parks.

4. Do you agree with our current thinking on planning for Better Greener Places?

We support initiatives to further the repopulation of rural areas and do not believe this planned outcome is in conflict with existing policies on wild land within the current SPP. We would like to see these policies (paras 200 and 215) retained in NPF4. The vast majority of Wild Land Areas (WLA) are in upland areas and were previously uninhabited. It is highly unlikely that there would be any significant constraints for development planning if new housing was being proposed, as the majority of any applications would be small scale, close to existing infrastructure and roads and therefore outwith the WLA.

WLAs are recognised as national assets in terms of their landscape qualities and as a setting for outdoor recreation. They should be integrated into the national Nature Network proposed by Scottish Environment LINK, which would not only support health and wellbeing but also stem the loss of biodiversity, a crisis which is ongoing in Scotland. We therefore need to both enhance, restore and create new nature networks which will help nature to thrive and build resilience, supporting a response to the climate emergency.

We trust these comments are helpful and would be pleased to discuss any of these issues in more detail.

Yours faithfully

Helen Todd
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