

13th December 2013

Wild Land Consultation  
Scottish Natural Heritage  
Great Glen House  
Leachkin Road  
Inverness IV3 8NW

Dear Sirs

### **Consultation on SNH Core Areas of Wild Land 2013 Map**

Ramblers Scotland appreciates the opportunity to respond to this consultation.

#### **Q1. What is your view on the Core Areas of Wild Land 2013 map?**

We very much welcome these proposals from Scottish Natural Heritage. Scotland is world famous as a country with large tracts of land and water of great natural beauty, of unspoiled landscapes which have not suffered from urban or other forms of intrusive development. These characteristics help to define Scotland as a nation and it is of vital importance that these qualities of wildness are recognised within the planning system and afforded appropriate levels of protection.

The mapping approach used by SNH, which recognises the different degrees of wildness found across the whole country, is a robust and logical way to approach this issue. It would benefit the UK if similar approaches were considered for the other nations. This mapping approach should lay the foundation for assessing the qualities of wildness in all locations, from suburban garden to mountain summit. While this particular map only considers the finest quality of Wild Land – the “Core Areas” – we believe that in due course it should be used for the whole country so that a much more objective approach can be used to determine what types of development are appropriate in different tracts of the countryside, according to the different degrees of wildness.

Ramblers Scotland has long voiced concerns over the continued attrition of Scotland’s wildland quality through various forms of development, including blanket afforestation, hill track construction, erection of masts and power lines, and some forms of renewable energy development. It is alarming to see the rate at which this attrition has increased in recent years, especially as a result of wind farm development, power line and hill track construction. We note that the N3 National Heritage Indicator: visual influence of built development (2013), shows that the area of land unaffected by visual intrusion shrank from 35% to 30% in just 3 years from 2008-2010. Previous indicators gave the area unaffected at 41% in 2002, showing the growing rate that development is continuing to intrude on Scotland’s wild areas.

The encroachment of large scale onshore renewable energy developments into upland areas is a particularly

**President:** Dr Andrew Murray  
**Convener:** David Thomson  
**Director:** Dave Morris

The Ramblers' Association is a registered charity  
England & Wales no 1093577, Scotland no SC039799)  
and a company limited by guarantee, registered in  
England & Wales (no 4458492). Registered office: 2<sup>nd</sup>  
floor, Camelford House, 87-90 Albert Embankment,  
London SE1 7TW

serious problem which existing planning policy has failed to constrain properly. The existing designation system of National Scenic Areas, Sites of Special Scientific Interest, National Parks, etc, was never designed to deal with huge vertical structures such as wind turbines which are visible over very large distances. The Wild Land mapping approach is a good start in providing a planning framework to deal with this problem.

While we are generally supportive of renewable energy, it is important that large scale developments do not intrude into areas of wildland value, especially into the Core Areas or into surrounding areas where the presence of such developments would diminish the Core Area wildland values. The setting around Core Areas needs to be taken account of in determining planning policy and decisions over particular planning applications. The Core Areas and their settings need to be recognised for all their values, including landscape, outdoor recreation, biodiversity, carbon sequestration and watershed protection, as well as the more intrinsic values placed on these areas in terms of benefits to health, tourism and, indeed, Scotland's national identity.

The Scottish public has expressed its support for the protection of wild land, for example in SNH's commissioned report 291, Public Perceptions of Wild Places and Landscapes in Scotland (2008), which demonstrated strong public support (91%) for the conservation of wild places, while 50% of residents felt these places were under threat. A further study in 2012 by SNH and the two national parks, Public Perception Survey of Wildness in Scotland, also showed that 72%-93% of respondents in the different groups thought that it was very important that Scotland had wild areas, while 86%-97% of respondents felt that further action was necessary to protect these areas.

We therefore feel that the principle of having a map of Core Areas of Wild Land will receive strong public support as well as providing a strategic spatial planning tool for planning authorities to use in determining applications. The map will also bring some measure of certainty for developers as they will have a national steer on where large developments are unlikely to be approved. The methodology outlined in the consultation document seems to us to be robust, recognising as it does that Scotland has no 'wilderness' or land free from human activities or influence, but that the qualities of wildness can be assigned attributes which form the basis of this mapped approach. The current map provides an excellent baseline and should not be reduced in any way. The main focus of debate should be on the extent to which development can be permitted in surrounding areas in ways which do not impinge on the wildland setting and the integrity of the wildland experience when inside the Core Areas.

## **Q2. Do you have any specific comments on any of the areas of wild land identified?**

We would expect that this map will continue to be refreshed on a regular basis with refinements being made as the technology improves. We anticipate that over time the Core Areas are likely to be extended as public support for wildland protection grows and land management policies evolve in ways which improve the wildland quality of many coastal, forest, moorland and mountain environments. We do not have any specific comments on the areas presented in this map. We are keen that this current map is adopted now to ensure an appropriate level of protection for these Core Areas of Wild Land is secured as soon as possible. The proposal outlined in the draft Scottish Planning Policy for National Parks and National Scenic Areas to be given protection from wind farm developments is welcomed, but these designations do not encompass other large and important tracts of wild land which are now included in this map. Protection of the Core Areas of Wild Land from wind farm development is just as important as protection of NPs and NSAs from such development.

## **Q3. Are there any other issues regarding the Core Areas of Wild Land 2013 map, or its preparation, that you would like to raise?**

We understand that the 2013 map does not include areas which would meet the criteria for Wild Land but

**President:** Dr Andrew Murray  
**Convener:** David Thomson  
**Director:** Dave Morris

The Ramblers' Association is a registered charity  
England & Wales no 1093577, Scotland no SC039799)  
and a company limited by guarantee, registered in  
England & Wales (no 4458492). Registered office: 2<sup>nd</sup>  
floor, Camelford House, 87-90 Albert Embankment,  
London SE1 7TW

where a development has already received consent, our feeling is that if the development has not yet been built, then the 2013 map should include this area. This would then help to provide a baseline map of the extent of land with wild qualities at this time. It is accepted that developments can take some years for construction to start and sometimes they do not even make it to this stage, for instance if there are changes to the economic circumstances of a developer.

We trust these comments are helpful and would be happy to discuss any aspect of this response in further detail at your convenience.

Yours faithfully

Helen Todd  
Campaigns & Policy Manager

Ramblers Scotland is the representative body for walkers in Scotland and recognised by **sportscotland** as a governing body of sport. We have 6,300 members across Scotland and 55 local walking groups, including 4 groups which between them cover the area of the Cairngorms National Park. Our aims are to promote walking, secure and facilitate public access to land and to protect the countryside.

**President:** Dr Andrew Murray  
**Convener:** David Thomson  
**Director:** Dave Morris

The Ramblers' Association is a registered charity  
England & Wales no 1093577, Scotland no SC039799)  
and a company limited by guarantee, registered in  
England & Wales (no 4458492). Registered office: 2<sup>nd</sup>  
floor, Camelford House, 87-90 Albert Embankment,  
London SE1 7TW