

NEW REPORT SHOWS A CONTINUING LOSS OF WILD LAND IN SCOTLAND

9 March 2022

Scotland's wild land is under continuing threat from inappropriate development according to a new report commissioned by the Scottish Wild Land Group, the Scottish Mountaineering Trust and The Cairngorms Campaign. The report concludes that, although there is strong support for wild land amongst the Scottish people, the remaining areas of wild, undeveloped hill and moorland in the Highlands continue their long-term decline.

Indeed, the overall rate of loss appears to be increasing as the scale of development has increased over the past 250 years. Current developments that pose the greatest threat are energy generation and associated infrastructure (hydro-electric schemes and wind farms), plantation forest expansion and hill track construction, the latter often associated with estate management. This long-term attrition of wild land is not helped by the fact that planning authorities have not been consistent in their approach to its protection.

Main findings

1. The wildest areas of Scotland have been mapped by NatureScot as 'Wild Land Areas', of which there are 42. There is no absolute protection for them under law, although they are referred to in Scotland's national planning policy where it states: "We also want to continue our strong protection for our wildest landscapes – wild land is a nationally important landscape." (from the National Planning Framework 3). However this new report concludes that the Wild Land Areas are at risk from development pressures and that their wild status is under threat of long-term degradation.
2. Development within these areas over the last 250 years has significantly impacted on the remaining areas of wild land. Such impacts are principally from road and track construction which reduce remoteness by providing easier access to wild areas, and from new structures which stand out in the landscape with a corresponding reduction in wildness.
3. Forms of visual intrusion have changed over the period mapped and have tended to go in phases starting with road and rail and construction, and more recently seeing phases of development in renewable energy: first hydro power in the 50s and 60s, wind energy in the last 20+ years and now small-scale run-of-river schemes. Plantation forestry has also moved in phases but at different rates throughout the period. Associated with all of these, and also with estate management, has been continual expansion of the hill track network.
4. It is only eight years since the mapping and designation of Wild Land Areas in Scotland in 2014. This makes it too soon to say whether they have had an effect on slowing the rate of loss of wild land from reductions in remoteness and visual impacts. Nonetheless, long-term and short-term rates of attrition, if extrapolated, would indicate continued threat to the remaining areas of unimpacted, remote wildland. Whether this means that there will be some future point at which all wild land ceases to exist is open to question.
5. Wind farms do not have to be inside the boundaries of a Wild Land Area to affect the experience of wildness because wind farms nearby are still highly visible. There are some Wild Land Areas, such as WLA 39 (East Halladale Flows, Caithness) and WLA 1 (Merrick, in Galloway) that are close to being surrounded by wind farms that have been built, consented or proposed. Additionally, Scottish Ministers gave permission for the Creag Riabhach wind farm which had turbines within a Wild Land Area (WLA 37 Foinaven–Ben Hee, in Sutherland).
6. The recent and current planning policy provisions at national and local level have not prevented the continuing attrition of wild land, whilst wind farm applications continue to be random, speculative proposals which are followed by often inconsistent decision-making. There is an absence of positive and consistent planning oversight.

Ineffectiveness of the current planning for new wind farms

An analysis on how decisions are made to approve or reject new wind farms in Highland shows:

- a) There has been no positive Council-led land use planning for wind energy.

- b) Instead, each application has been entirely locationally specific, largely driven by there being a willing landowner, followed by an individual project recommendation and/or decision often taken by someone with no democratic accountability to the locality.
- c) The result is completely random decision making in respect of wind farms.
- d) This non plan-led speculative application and decision-making process lies at the heart of the significant disagreements between interested parties and within communities when individual projects are considered.

The above conclusions are in stark contrast with the conclusions that would be reached in looking at almost any other form of major land use developments in Scotland.

Recommendations relevant to the current Government consultation on new National Planning Framework (NPF4)

The Scottish Government is currently consulting on the content on the new National Planning Framework (NPF4), with a deadline for responses of 31 March 2022. The existing policy as given in Scottish Planning Policy 2 states:

"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."

To ensure there is still wild land in Scotland for future generation to enjoy, this statement needs to be retained in the new NPF4, and the policies on Wild Land Areas must not be abandoned or watered-down. Longer-term, the Wild Land Areas need to be given a stronger legal underpinning so that attrition of their special qualities no longer takes place.

In particular, if the Wild Land Areas and other wild and precious land is to be seen as a national level asset to be protected and managed positively, then three things need to happen:

- 1) The decisions on the location of renewable energy schemes, and all of the ancillary directly associated onsite and offsite facilities, needs to be a Development Plan led process (as it is currently in England) which identifies preferred wind farm locations.
- 2) The process has to be driven by local democracy, community and place, the concepts that fundamentally underpin every other aspect of the statutory land use planning system in Scotland.
- 3) Within that process, landscape protection, planning and management policy, at national and local level, has to set out a map-based framework that identifies the National Parks, the National Scenic Areas, the Wild Land Areas and their settings; with an associated ban on commercial-scale wind farms in order to consistently and predictably deliver the required degree of protection from harm. It is recognised that this will probably need legislative change in order to modify the procedures for Electricity Act applications.

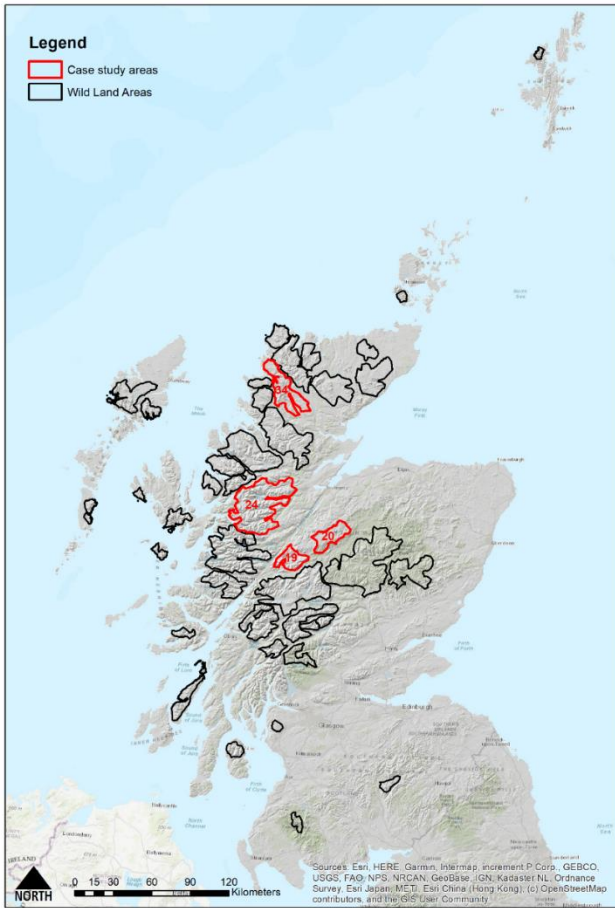
Report details

The research team used a sample of four Wild Land Areas to analyse in detail the landscape changes which have occurred from the 1750s to the present day. It was commissioned by the Scottish Wild Land Group in association with the Scottish Mountaineering Trust and The Cairngorms Campaign, all of which are voluntary organisation with a keen interest in the protection of wild land. The research was undertaken by Wildland Research Ltd, who have long-running experience in the mapping and evaluation of wild land in Scotland, and by the Ian Kelly Planning Consultancy Ltd, who have particular expertise in looking at the impact of renewable energy schemes on wild land.

The report is available to download from the Scottish Wild Land Group's website:
<https://www.swlg.org.uk/news.php>

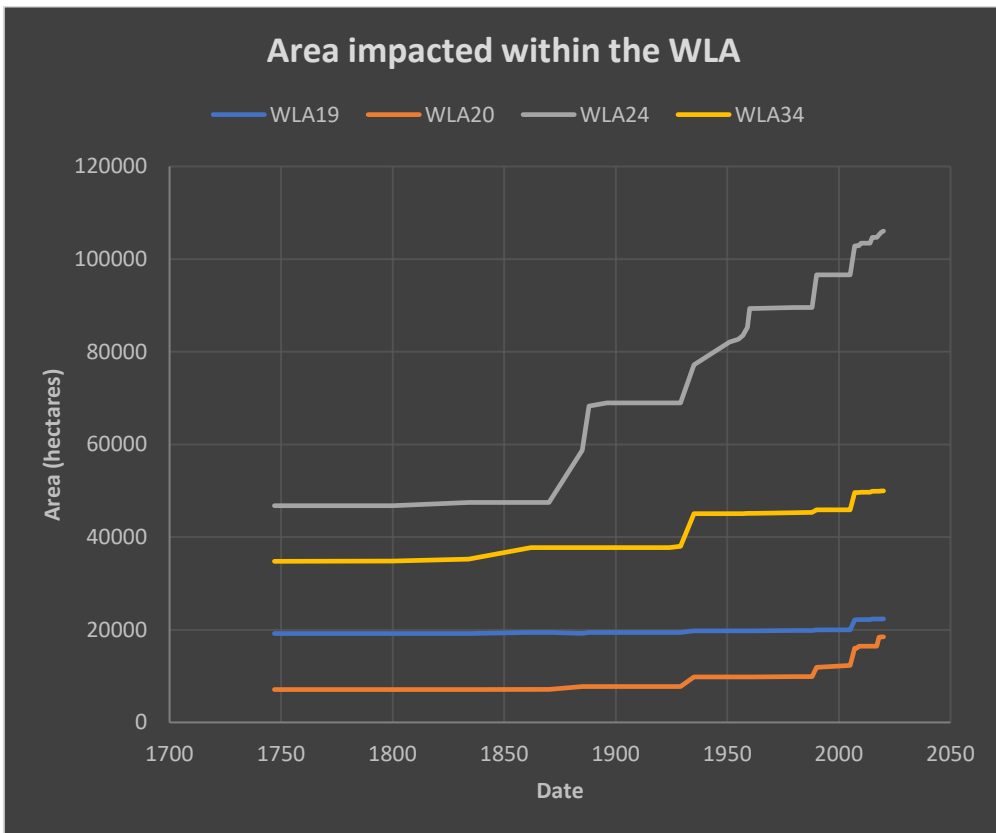
Further information, and also hard copies of the report (free), can be obtained by contacting James Fenton: <mailto:ecology@fenton.scot?subject=Wild Land Report>

Report name: Wildland Research & Ian Kelly Planning Consultancy (2022). *The State of Wild Land in the Scottish Highlands*. Scottish Wild Land Group, 140 pages.



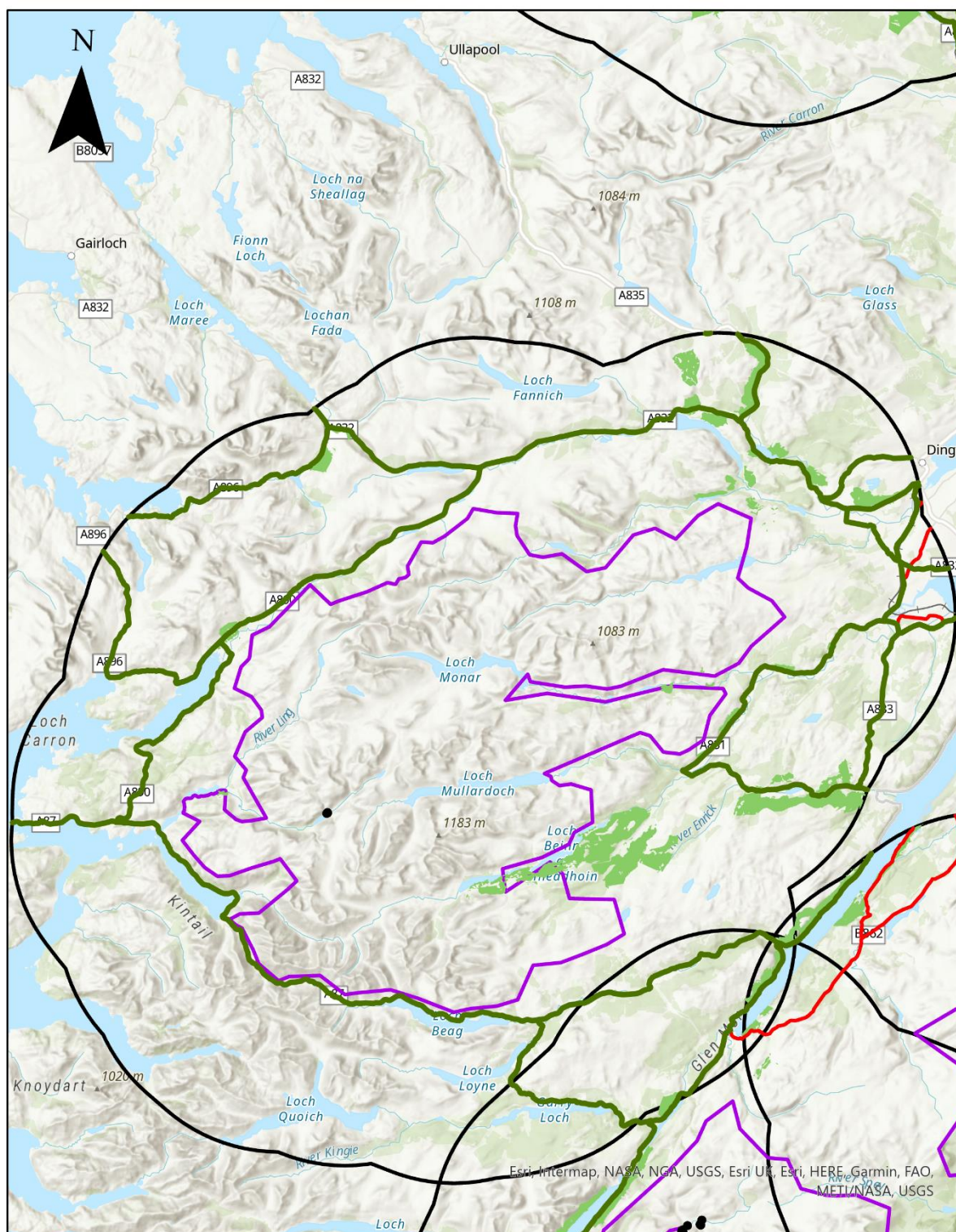
The 42 Wild Land Areas in Scotland, with the four chosen as case studies for this report outlined in red.

Rate of loss of wild land over time



Long-term trend in wild land attrition rates (1747 – 2020). WLA19, WLA20, WLA 21, WLA 34 are the four case study Wild Land Areas (from Figure 3.10 of the report).

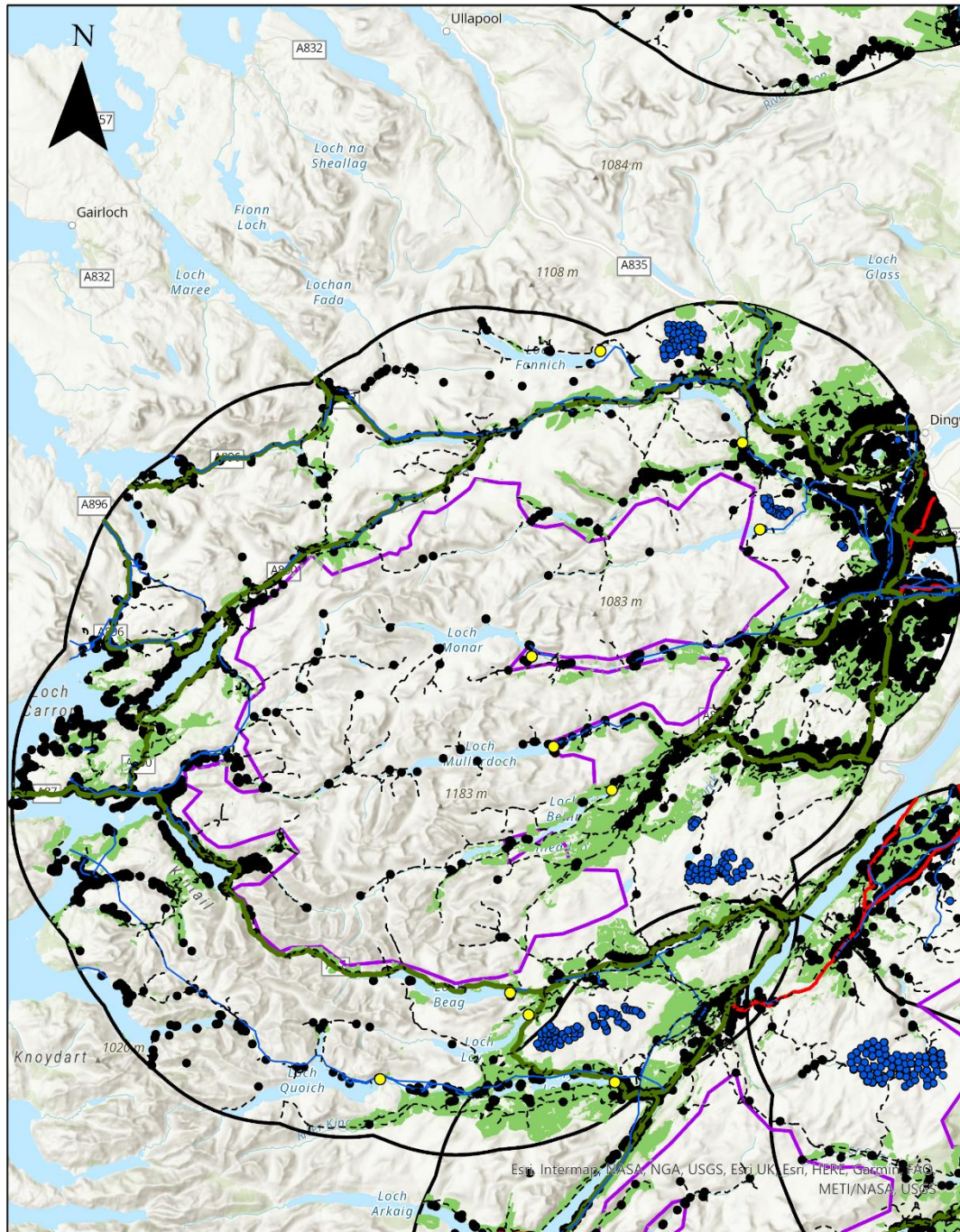
Example of loss of wildness in Wild Land Area 24, Central Highlands.



Legend

- A roads
- B roads
- Buildings
- Plantation forest
- Rail
- Wildland Areas
- 15 Kilometre Buffer

Wild Land Area 24: Central Highlands, which includes Loch Affric, in 1862 (from Figure A3.14 of the report). Note: buildings outside the WLA are not mapped.



Legend

- Hydro Schemes
- windfarms
- TransmissionLine
- A roads
- B roads
- Buildings
- Plantation forest
- Rail
- Wildland Areas
- 15 Kilometre Buffer
- Minor roads and tracks

Wild Land Area 24: Central Highlands, which includes Loch Affric, in 2020 (from Figure A3.19 of the report).