



## Scottish Natural Heritage Dualchas Nàdair na h-Alba

All of nature for all of Scotland  
Nàdar air fad airson Alba air fad

### PE1383/D

Fergus D. Cochrane  
Clerk to the Committee  
Public Petitions Committee  
TG.01  
The Scottish Parliament  
EDINBURGH  
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Your ref:

Our ref: B791439

Date: 2<sup>nd</sup> February 2011

[petitions@scottish.parliament.uk](mailto:petitions@scottish.parliament.uk)

Dear Fergus

### PETITION PE1383 – BETTER PROTECTION FOR WILD LAND

Thank you for inviting our views on the John Muir Trust petition regarding the protection of Scotland's wild land.

SNH is at one with the petitioners in the desire to see the value of Scotland's wild land recognised and respected in decisions concerning development and land use change. Where it differs from them is on the question of whether a new statutory environmental designation is the necessary, or even the best, means of achieving this end. This submission explains why it is sceptical on this count. It concludes, however, by agreeing with the petitioners that the issue raised is one deserving serious, and urgent, attention.

#### Importance and value of wild land

SNH's approach to wildness and wild land is set out in our 2002 policy statement *Wildness in Scotland's countryside*. This draws a distinction between wildness (the quality enjoyed) and wild land (those places where wildness is best expressed). The latter is generally found in our more remote mountain and moorland areas, on the most isolated sections of coast and on uninhabited islands. But wildness can be experienced in a range of settings, such as rocky gorges and more managed countryside, and even close to settlement. Its appreciation is a matter of individual experience and perceptions, and influenced by the season and the weather. It does not therefore easily lend itself to drawing simple lines on the map.

Whilst the petition focuses on our wildest landscapes, SNH favours a broad approach which recognises that the quality of wildness can be enjoyed in less wild places. This caters better for the many people who value this quality but live at some distance from, or are unable to experience, our wildest landscapes.

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Wildness is a highly valued quality of Scotland's more natural landscapes, which for many constitute one of the country's defining characteristics. Our wilder landscapes bring many benefits to the nation, including supporting tourism and recreation, providing health and social benefits, playing a key role in the hydrological cycle, and acting as a store of carbon and carbon capture, thus contributing to our efforts to mitigate climate change. An SNH-commissioned review of the benefits and opportunities provided by our wilder landscapes concluded that they provided greater economic and employment benefit than agriculture and forestry combined, particularly in terms of productive output (tourism)<sup>1</sup>.

There is strong support for wild land and its conservation in Scotland. A 2008 SNH-commissioned market research study<sup>2</sup> has shown 91% of Scotland's population think it is important for Scotland to have wild places (71% thought it was very important). Our quarterly natural heritage omnibus survey has confirmed this view – for example 98% of respondents agree with the statement that '*Scotland's areas of wild land should be protected*' (June 2010 survey).

However 50% of Scotland's population consider Scotland's wild places are under threat and 61% believe action is required to protect them (2008 study). Concerns on this score are reflected to some extent in our omnibus survey, with only 70% agreeing with the statement that '*Scotland's nature and landscapes are well protected*' (this resource is of course much wider than wild land alone). These figures have remained consistent over the series of quarterly surveys run since 2009.

### **Extent and condition of Scotland's wild land resource**

Whilst wild land as a distinctive resource has long been recognised and much debated, there is no definitive map identifying where it can be found. Our policy statement includes a map of 'search areas for wild land'. This map does not attempt to delimit wild land but identifies the largest blocks of remote countryside where most wild land is likely to be found. The intention is that this map (and accompanying policy) would prompt local authorities to consider wildness and wild land when preparing their development plans, and guide them in doing so. Although the map is indicative of wild land and not comprehensive in its coverage (it does not, for example, include all wild coasts and islands), the search areas that it highlights have been referred to in development management casework. We are also now seeing interest in applying the policy approach advocated in the new generation of Development Plans.

Given the limitations of the search areas map, we are currently undertaking new mapping work. This will map relative wildness for the whole of Scotland and then seek to identify wild land (and potentially other areas of particular value, such as less wild but more accessible areas). The approach to mapping wildness is similar to an earlier study undertaken with the Cairngorm National Park, and not dissimilar to the approach that the John Muir Trust has taken in mapping the whole of the UK (although there are important differences in the criteria adopted). We hope that our mapping work will be completed by early summer 2011.

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<sup>1</sup> McMorran, R, Price, MF, and McVittie, A (2006) A review of the benefits and opportunities attributed to Scotland's landscapes of wild character. SNH Commissioned report no. 194.

<sup>2</sup> Market research partners, Edinburgh (2008). Public perceptions of wild places and landscapes in Scotland. Commissioned report no. 291.

In the absence of an agreed map of wild land, it is difficult to assess change in its extent and quality. Certainly as the requirements of modern society have necessitated the introduction of certain types of development into Scotland's more rural and remote areas, the extent and degree of wildness experienced in these landscapes has diminished.

The SNH statistic on *Visual influence of built development and land use change* referred to in the petition provides a coarse indicator of change for the whole of Scotland, not just our wild landscapes. This assessment relies on theoretical visibility, without factoring in screening by vegetation or the effect of distance. Nonetheless it provides a useful indication of current trends. We have updated the 2008 data for 2009 which indicates that the area without visual influence decreased from 31% in January 2008 to 28% in December 2009. Our initial analysis suggests that the most significant contributor to this decline is the development of wind farms, a consequence of their prominence and extensive visibility and siting in rural locations with little or no previous development.

A more detailed study<sup>3</sup> has been undertaken of the Affric-Kintail-Knoydart area, exploring historic trends in the extent of wild land by considering the visual effect of roads, tracks, plantation forest and hydro-power schemes, and changes in accessibility. This revealed a reduction in the area unaffected by these features of around a third over the past 100 years, with the scale of change much greater in the second half of the 20<sup>th</sup> century.

### **Safeguarding our wild land resource**

There are a number of existing mechanisms for safeguarding wild land. We are pleased that the sensitivity of our wildest landscapes and their limited ability to accommodate development is recognised by Scottish Planning Policy and the National Planning Framework 2. Some of our wildest landscapes fall within existing protected areas, including National Parks, National Scenic Areas and various biodiversity-based designations. These all, in varying degree, provide a level of protection to the qualities concerned, even where they did not form the basis of the initial designation. We recognise, nevertheless, that a significant proportion of our search areas for wild land lies outwith current protected areas.

Our wild land mapping work, when complete, will replace our existing search areas approach. It will provide a sound basis for local authorities to accord specific attention to the needs of their wilder landscapes in their development plans. We intend to share the results of our mapping work with Scottish Government and to discuss with them its implications, including the question of whether there is a need to identify at a national level areas of particularly importance.

### **Conclusion**

SNH welcomes debate about how we can better safeguard this important resource. Given its continuing erosion, we believe that there should be a strong presumption against intrusive development in areas that are widely judged to possess the relevant qualities. However we do not in present circumstances see a separate wild land

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<sup>3</sup> Carver, S and Wrightham, M. (2003) Assessment of historic trends in the extent of wild land in Scotland: a pilot study. SNH Commissioned report no. 012.

designation as a necessary step to achieve this. Our existing suite of natural heritage designations is already complex and, to many, confusing. What we require is an effective system for guiding development, and wider land use change, that recognises the particular sensitivities associated with wild land and gives due weight to them in the decision-making process. In our view the challenge is to do that in a way that commands widespread acceptance, and is thus effective, without adding further to the already substantial tally of formal designations.

We would note, however, that given the intensity of current pressures, the time available for existing approaches to prove their efficacy must be regarded as limited. If they are unable to do so, alternatives such as that advocated by the John Muir Trust would become essential. There is a history, in the field of environmental protection, of acting decisively only when the resources in question are under extreme threat. Given the distinctiveness and rarity of Scotland's wild land resource – in a western European, not purely a UK, context – we must surely avoid this trap and act before it is too late.

I hope the Committee will find the information provided here useful. If you have any questions on the detail please contact [simon.brooks@snh.gov](mailto:simon.brooks@snh.gov) (01463 725315) in the first instance.

Yours sincerely

**John Thomson**  
**Director of Strategy and Communications**