



PE1383/I

John Muir Trust response to comments sent by the Scottish Rural Property & Business Association (SRPBA).

The John Muir Trust welcomes the opportunity to respond to the comments submitted by the Scottish Rural Property & Business Association (SRPBA).

Abundance of conservation designations in Scotland

The John Muir Trust notes that the SRPBA feels there is already an extremely complicated "... abundance of conservation designations in Scotland" and that the introduction of a new wild land designation would only add to the confusion. Whilst it is true that a significant number of ecological designations have been developed under European Directives over recent years, there is no designation that gives protection to "wild land" as an entity in itself. It is presently the case that important animals, birds and habitats are generally well-protected by a range of statutory designations, but landscape as an entity in itself has relatively little statutory protection. Whilst some wild land is afforded protection because it lies within areas designated as "National Scenic Areas" (Scotland) or falls within the boundaries of National Parks, the evidence is that wild land is not receiving clear and explicit recognition throughout the Scottish planning system or when decisions are made on sustainable land use despite National Planning Framework for Scotland 2 and Scottish Planning Policy noting that it should. Therefore, whilst the John Muir Trust understands the concerns about adding to the existing suite of conservation designations, the evidence suggests that the present system is not working to protect Scotland's wild land and that the value of wild land to Scotland is such that a new designation is justified.

Difficulties of designation

SRPBA foresees difficulty in establishing a wild land designation on the grounds of "difficulties of definition." Whilst there is no universally agreed definition, in the John Muir Trust definition "wild land" is restricted to large areas with spectacular scenery and high wildlife value and where there is very little evidence of human activity. Other organisations have come up with a similar definition of wild land. Wild land areas in the UK comprise some of our most iconic and sensitive landscapes.

The John Muir Trust has taken the lead in mapping wild land throughout the UK and the Trust believes that this work (for which detailed criteria and methodology can be provided), combined with additional, more detailed work currently underway for Scotland by Scottish Natural Heritage (SNH), makes it feasible to come up with a robust definition of wild land, with more accurate mapping than SNH's current indicative Search Areas of Wild Land. These new maps will be extremely valuable in

informing the debate and framing a potential designation for wild land in Scotland. A new designation would need detailed discussion about criteria, boundaries and other aspects - as there would be when developing any Bill or regulation.

We also note the SRPBA point that there is no real “wild land” in Scotland. We agree that almost nowhere in the United Kingdom is entirely natural or free of past or present human manipulation. However, despite millennia of human influence, there are still areas that have remained free of major man-made intrusions. While some areas of wild land contain evidence of significant past human activity (such as ruined buildings or ancient cultivation) such archaeological remains, created using only “close to hand”, natural materials, may have little or no impact on wild land qualities.

Threatened “wild land” versus threatened communities

SRPBA refers to designations creating a tension between “threatened wild land” and “threatened communities” and makes the point that wild land areas are the areas in most urgent need of socio-economic assistance. We are sympathetic to the need to have vibrant communities around wild land. (The “core” wild land does not have communities within it). The John Muir Trust is not arguing for a complete ban on development around wild land areas. The Trust believes that the value of our wild land is such that it must be protected from *inappropriate* development, ie development that has an adverse impact – decreasing its value and potentially reducing the contribution wild land makes to Scotland’s environment and economy. The Trust strongly believes that it is possible to protect our best landscapes from inappropriate development whilst allowing appropriate development around such areas and is highly supportive of the scope for genuinely sustainable development in wild land areas. For instance, the use of buffer zones is one method used in other countries to protect the core wild land whilst allowing suitable development - generally for wild land-related tourism and recreation. It should be noted that these activities are often the key economic activity in such areas and their continuation depends on the wild land being protected. So protecting the core area is a win-win – in terms of economic, social and environmental value. As such, it should be possible to meet the needs of people and communities in wild land without destroying the value and special qualities of wild land.

Developments on the edge

SRPBA expresses concern that there is a possibility, when establishing a wild land designation, that the distinct sites that would be created could become ringed by developments around their edges. The Trust shares this concern, and it might be that a zoning approach, with a buffer zone, would be appropriate to reduce the likelihood of this happening. However, if development pressure is such that a protected area is likely to become ringed with development, how much more likely is it that, without a designation, pressure would lead to unsuitable development even further into the core wild land?

Achieving other targets

The Trust does not agree that there is necessarily a conflict between the various land-based targets currently in the policy arena. With respect to the Scottish Forestry Strategy’s ambition to increase tree cover in Scotland, the need for more native woods is increasingly recognised and, indeed, natural wood regeneration is one of the valuable contributions wild land can make and the John Muir Trust spends considerable resources and effort on its own properties to encourage this. Scotland’s past experience with unsuitable commercial species planting on deep peat and wild

land areas, encouraged at the time by subsidy, should help society learn lessons. How much better would it have been if the Flow Country of Caithness and Sutherland had not had such a policy implemented, only for restoration to be required now?

The Trust also notes SRPBA's concern that new renewable energy developments would not be permitted within a "wild land" designation area and, that as a consequence, it would be difficult for Scotland to meet its ambitious targets outlined in the Climate Change (Scotland) Act 2009. The Trust is not opposed to all renewable energy developments within wild land – size, type and scale are factors to be considered, as well as the context of local community needs. This petition is not about wind farms – it is about protecting a much-loved and valued resource from inappropriate development. Thirty years ago that pressure would have been from commercial forestry planting. Today it is industrial-scale wind development.

Wild land in Scotland currently faces a particular threat from the rapid expansion of wind farms but wild land has faced, and may in the future face, different but equally significant threats.

Conclusion

The Trust response to the SRPBA submission, therefore, is that a wild land designation would ensure that our best wild land is given better protection. Given its vital contribution to Scotland's economy, society, environment and spiritual needs, there is a pressing need for action to better protect wild land - a point that has been confirmed by all other respondents to our petition so far.