NPF4 Position Statement - a response from the John Muir Trust

Introduction

The John Muir Trust is a conservation charity dedicated to the experience, protection and repair of wild places. Our response to the NPF4 Position Statement has focused on the statements and potential policies that we consider most relevant to our charitable aims. We have provided summary responses to two of the consultation questions that we considered most relevant to the future protection of wild places and a full response to the Position Statement in an Annex. This focuses on how Wild Land Areas can contribute to National Planning Outcomes and be incorporated into NPF4 as national and community assets, areas of land that can support nature recovery and sequester carbon through upland restoration, and which can also form part of a spatial framework for determining and directing where new large-scale commercial development, particularly commercial renewable energy development, can be appropriately sited. We are happy to be contacted about our response.

Summary responses to consultation questions

Question 4: Do you agree with our current thinking on planning for better, greener places?

We agree with the following statements

- '*Protecting, restoring and enhancing our natural and cultural heritage should form the foundations of a place-based approach to our future development'* and recommend this extends to recognising Scotland's wildest places as assets to be protected (i.e. through NPF4 policies that mean wild land and Wild Land Areas continue to benefit from the protection that they have had under NPF3 and Scottish Planning Policy 2, making use of the existing Wild Land Areas map), made more resilient (e.g. through NPF4 policies that protect connectivity between wild places) and enhanced (e.g. through NPF4 policies that require pro-active planning by local authorities for 'green and blue infrastructure').

- '*Our spatial strategy will strengthen our approach to protecting and restoring the health and quality of Scotland's natural environment'* and recommend this is translated into policy in NPF4 as a spatial strategy that guides new built large-scale commercial development away from Scotland's wildest areas, using the Wild Land Areas map as a guide, Scotland's nationally important peatlands, and nationally and internationally important areas for conservation as evidenced by their designations (i.e. Natura 2000 and Ramsar sites, SSSIs, National Nature Reserves, World Heritage Sites, Special Conservation Areas and Special Protection Areas). We also recommend that National Parks and National Scenic Areas continue to be areas where large scale commercial development is not acceptable. The spatial framework provided in Table 1 of Scottish Planning Policy 2 has helped to provide consistency and certainty for determining applications for onshore wind development whilst allowing case by case decision making of applications on their merits. We recommend that this Table and set of policies is retained as the backbone to a spatial strategy in NPF4 that will strengthen an approach to protecting and restoring the health and quality of Scotland's natural environment.

- '*We will ensure that our approach to planning supports Scotland's role in responding to the twin global crises of biodiversity loss and climate change, including by strengthening policies designed to protect and restore Scotland's biodiversity and natural assets and to improve their long term resilience to the impacts of our changing climate*' and recommend this is translated into policy in NPF4 which places primary importance on protecting carbon and species-rich habitats, including peatlands, wetlands and native and ancient woodlands (including recognition for Scotland's Rainforest). Responding to the twin crisis means reversing biodiversity loss so in addition to protecting existing habitats, NPF4 needs to incorporate policies that make nature recovery a consideration of every planning decision and which make the restoration potential of land part of criteria for deciding whether new development on that land is appropriate land use.

Policies we specifically support

- We support embedding the place principle throughout NPF4 as a way to achieve a shared understanding of a place and how its assets can serve the community.
- We support reframing policy to reflect the fundamental role of our natural environment and biodiversity in providing essential natural services and benefits for our economy, health and wellbeing, and climate resilience. We commend Scottish Environment LINK's response to the NPF4 position statement on how national policy can be reframed in terms of the biodiversity and climate crisis.

Policies we have reservations about

- We ask for careful evaluation of the drivers of rural re-population. Specifically what current planning policies or actions have resulted in rural re-population as part of considering whether policies on wild land need to change? We are not aware of any evidence that wild land is responsible for de-population given it only applies to very narrow planning guidance. We question this claim in the Position Statement and would be keen to see the evidence this is based on.
- Whilst the Position Statement refers to '*ensuring effective safeguards for our natural environment and landscapes*' it does not indicate how NPF4 can plan for the safeguarding and protection of locally, as well as nationally, important landscapes. We suggest it could do this by: a) identifying these landscapes; b) point to existing data and evidence on their qualities; and c) define criteria for evaluating if and how new development enhances or, at a minimum, protects a landscape's qualities and character.

Question 1: Do you agree with our current thinking on planning for net-zero emissions?

We agree with the following statements

- *'We expect that NPF4 will confirm our view that the Global Climate Emergency should be a material consideration in considering applications for appropriately located renewable energy developments'*. In agreeing with this we commend the recognition that renewable energy development, as a significant land use change, should be appropriately sited. NPF4 needs to provide a clear set of policies that give developers, the public, communities and planners certainty and confidence and reduce the time spent on applications that are

repeatedly refused or which go to Public Local Inquiry – a contributory factor to repeat applications and prolonged decision making is planning policies not being clear, certain or detailed enough at the outset.

- '*We have made good progress in transitioning from reliance on fossil fuels to renewable electricity generation in a way which is compatible with our environmental objectives*.' NPF4 should retain policies from SPP2 and NPF3 that have helped to steer large scale development (in the form of on-shore wind as a result of the spatial framework in SPP2) from inappropriate areas. NPF4 should clearly rule out new large-scale built development in Scotland's National Parks and National Scenic Areas. Given the climate emergency and the national importance of peatlands as a carbon store, there should be a presumption against new large-scale built development that would result in the excavation and disruption of healthy peatland bogs. Areas rich in wildlife, ancient woodland habitat and Wild Land Areas should all continue to receive a level of protection from inappropriate development as that provided under existing NPF3 and SPP2.

- '*Scotland's natural environment plays a vital role in removing carbon from the atmosphere and securing it in natural habitats on land and in our seas. Promoting nature-based solutions to climate change, including tree planting and peatland protection and restoration, and tackling emissions related to soil disturbance and agricultural land use, will be essential to reduce emissions from our land and increase carbon sequestration. They can also help to sustain and grow rural communities and improve the quality of our built environment. Our spatial strategy will explore how we can promote nature-based solutions to climate change, which also protect and restore biodiversity and deliver wider benefits*.' We commend Scottish Environment LINK's response to the NPF4 Position Statement on how nature-based solutions can be supported through NPF4, in particular through policies that prioritise the creation of a Scottish Nature Network.

Policies we specifically support

- We support introducing a policy that gives preference to re-powering of existing windfarms as this is reduces pressure on land available and suitable for new energy development. We would expect re-powering windfarms to be subject to a new planning application. Expanding existing wind farms may be appropriate in some cases. These projects would also need to continue to be subject to a new planning application and NPF4 would need to provide a clear policy direction for an upper limit, landscape capacities or sensitivity qualifications and where expansions are not expected to be appropriate. Without conditions or criteria to guide expansion there is a risk of ever-expanding wind farms and separate wind farms merging into developments that could turn formerly rural communities and rural landscapes into industrial ones – this, we suggest, would be in conflict with a policy of re-peopling and rural regeneration, rendering beautiful places currently desirable to live in, uninhabitable.
- We support introducing new policies that address a wider range of energy generation technologies for example for electrical and thermal storage, and hydrogen. Especially if these policies could encourage minimised land use, reduce pressure on land and/or result in integrated land uses.

- We support policies in NPF4 that discourage new developments that would generate significant emissions across their lifespan, including those which would result in a land use change that would generate significant emissions. Given that peatlands are the single most important terrestrial store of carbon and will become increasingly important for maintaining net zero emissions from 2045, NPF4 could make a significant contribution towards the net zero targets (as well as biodiversity) by introducing a presumption against any new development on healthy functioning peatlands.
- We fully support policies in NPF4 for '*Promoting nature-based solutions to climate change, including woodland creation and peatland protection and restoration*.'
- We support policies in NPF4 that promote integrating development with natural infrastructure, including blue-green networks, to deliver multiple benefits including carbon sequestration, community resilience and health improvement. Please see Scottish Environment LINK's response for recommendations on how a Nature Network, incorporated into NPF4, could promote integrating development with natural infrastructure by being considered as part of national infrastructure planning.

Policies we have reservations about

- Whilst we support retaining a spatial framework for onshore wind that includes protecting National Parks and National Scenic Areas, we would like this to also continue to incorporate Wild Land Areas (please see fuller response to explain our position in Annex below). We therefore cannot support the blanket statement *'whilst allowing development outwith these areas where they are demonstrated to be acceptable on the basis of site specific assessments.'* If NPF4 fails to specify areas where development is not appropriate there will be greater uncertainty, an even greater reliance on the opinion of consultants and impact assessments (the requirement for sites '*to be acceptable on the basis of site specific assessments'* is a requirement through the Environment Impact Assessment Regulations and one that will need to continue to apply to inform planning decision making for developments that meet the EIA criteria) and a greater burden on the planning system - as uncertain policy has to be tested through the planning application process. In turn, these uncertainties in policy could lead to a growing number of Public Local Inquiries, which are divisive in local communities, resource intensive and expensive for all concerned. NPF4 needs to be a pro-active plan, directing where onshore wind development, as well as emerging renewable energy technology development and infrastructure, should, and clearly where they should not, be sited.

ANNEX

A case for retaining Wild Land Areas in NPF4 as part of a spatial expression of Scotland's natural capital and rural community assets.

Overview

The NPF4 Position Statement recognises that there needs to be a national response to the climate emergency: '*We will have to rebalance the planning system so that climate change is a guiding principle for all plans and decisions'* and the biodiversity crisis '*Expanding green infrastructure, biodiversity and natural spaces to make our places greener, healthier and more resilient to the impacts of climate change*'. To do this meaningfully, NPF4 will need to identify and prioritise land use for **natural carbon capture and ecological restoration**, promote complementary policies for rural and community regeneration with policies for ecological restoration, and pro-actively allocate areas for renewable energy development that will help us to meet our net zero target by 2045 that exclude our most sensitive and wildest landscapes and take into consideration land required for the connection and expansion of nature.

Summary of what the inclusion of WLA in NPF3 and SPP2 has achieved

In the absence of statutory protection, by identifying Wild Land Areas[1] as nationally important in NPF3 and incorporating them into a spatial strategy for onshore wind development in Scottish Planning Policy (SPP)2, the Scottish Government afforded these areas some level of protection that otherwise would not have existed. **In doing so, they ensured that, overall, the ecological, natural capital and landscape value (and potential restoration and carbon sequestration value) of Scotland's Wild Land Areas has been protected.** Collectively, these areas account for '88% of the national stock of montane habitats, 79% of montane vegetation, 52% of blanket bog complexes, 49% of wet heaths, and 71% of screes, inland cliffs and rock outcrops'[2]. They also provide essential 'regulatory services' (e.g. clean water filtration, carbon sequestration and vegetation cover that reduces erosion), are landscapes for recreation, places people call home, and attract millions of visitors each year.[3]

Local Authorities were able to replicate the spatial framework for onshore wind with reference to Scotland's Wild Land Areas in their Local Development Plans. In this way, **the spatial framework has given Local Authorities a legitimate backstop on which to reject proposed potentially damaging development that was not in the public interest**. In doing so they have been able to exercise control over the scale and siting of development as a public interest counter-balance to market-led outcomes. The continued utility of Wild Land Areas in guiding planning decision making is further evidenced by the Local Authorities that have incorporated them into updated Local Development

[1] Wild Land Areas represent the most extensive areas where the qualities of wildness (remoteness, ruggedness, perceived naturalness and absence of human artefacts) are most strongly expressed.
[2] NatureScot commissioned study, 'A review of the social, economic and environmental benefits and constraints linked to wild land in Scotland', 2017.
[3] Please refer to the ten case studies in NatureScot commissioned report, 'A review of the social, economic and environmental benefits and constraints linked to wild land in Scotland', 2017, for more detail on the different, regional benefits the Wild Land Areas.

Plans as well as the 11 Local Authorities that asked for NPF4 to provide a spatial framework in their Call for Ideas consultation responses.[4] [5]

At the same time, the spatial framework has provided greater clarity to developers, planners and communities alike. Recognising Wild Land Areas as 'areas of significant protection' has steered on-shore wind development towards land outwith these areas. With accompanying Wild Land Impact Assessment guidance (approved by Scottish Ministers in 2020), developers have sought and applied pre-application advice from NatureScot and have been able to evaluate impacts on these areas, aiding the ability of Planning Authorities to decide whether proposed development is in the public interest. Through the use of this guidance and pre-planning advice (which is flexible enough to adapt to changing requirements – e.g. the requirement for aviation lighting and the impacts lighting can have on Scotland's Dark Sky Parks and Wild Land Areas) this process is working.

How retaining Wild Land Areas fits with aspirations of NPF4

We recognise that much has changed since the adoption of NPF3 and Scottish Planning Policy (SPP)2 in 2014. Policy implementation on reform of land ownership and management has moved on with the establishment of the Scottish Land Commission; there has been **growing sympathy for the need to restore the ecology of our wild places**; progress has been made towards dealing with deer and grouse moor impacts; huge **progress has been made with decarbonisation of much of the electricity sector**; the cost of offshore wind has fallen and new renewable technologies are emerging; and there is **growing sensitivity to community concerns about how the land around them is used**.

In this changed context, there is an opportunity for NPF4 to recognise the direct contribution that Wild Land Areas can make to National Planning Outcomes[6]. **Wild Land Areas can reduce greenhouse gas emissions through natural carbon sequestration** with appropriate areas seeing ambitious peatland and native woodland restoration which at the same time provides a response to the decline[7] of nature by improving Scotland's biodiversity; they can **contribute to improving people's health and wellbeing** as wild landscapes that offer peace, solitude, tranquillity, challenge and adventure; **they can provide environments that support high quality of life for people who live and work in rural communities around them** and they are **an asset around which rural communities can plan.** With the expansion of on-shore wind development since NPF3 and SPP2, NPF4 should **recognise the increasing pressures[8] on Scotland's wild landscapes and the progress made towards targets**. Scotland has an installed renewable energy capacity of 11.9GW, an existing pipeline of a

[4] See, for example Argyll and Bute Local Development Plan 2, Cairngorms National Park Authority Local Development Plan 2.

[5] See Call for Idea consultation responses from Aberdeenshire Council, City of Edinburgh Council, East Dunbartonshire Council, East Lothian Council, Inverclyde Council, Moray Council, Orkney Islands Council, South Lanarkshire Council, Stirling Council, West Dunbartonshire Council, West Lothian Council

[6] Namely the following four outcomes: Improving the health and well-being of people living in Scotland, Increasing the population of rural areas of Scotland, meeting greenhouse gas reduction targets, securing positive effects for biodiversity.

[7] According to the State of Nature Summary Report for Scotland, published in 2019, the 'abundance indicator for 352 terrestrial and freshwater species for which Scotland-specific trends are available shows a significant decline in average abundance of 24% since 1970, and 12% over the past 10 years'

[8] Please see NatureScot's national indicator of visual influence of built development shows one or more types of built development can be seen from 73% of Scotland's land area by 2013, up from 71.4% in 2012, and 65.4% in 2008. It reported the largest change was due to wind turbines, increasing from 19.9% in 2008 to 45.9% in 2013.

further consented 13.5GW, and 90.1% of Scotland's gross electricity consumption was met in 2019.[9] NPF4 can provide clear policy direction on: a) how much more onshore wind capacity is required? b) where would this best be sited?

A clear policy direction as to where the remaining requirement for renewable energy development is appropriate, which incorporates consultation with and consent from local communities, could ensure efficient and effective use of the planning system as well as protection or our most important and precious landscapes. This would be in line with Recommendation 9 of *Rural Planning Policy to 2050 report recommendations: Research to inform NPF4*: '*NPF4 should provide a clear steer on planning policy in regard to new waves of renewable energy development, in particular in relation to areas that are identified as having significance in terms of their landscape, biodiversity and/or carbon sequestration values (e.g. National Scenic Areas, 'Wild land Areas', peatlands).*'

How Wild Land Areas benefit people of Scotland and could benefit even more if well planned

Wild Land Areas are great places to live, work and visit

Wild Land Areas include many great mountaineering destinations that **attract people to live near them and to visit them**. Wild Land Areas contain 269 (out of 282) Munros (mountains over 3,000ft) and 177 (out of 222) Corbetts (mountains between 2,500-3,000 ft). This leaves just 13 Munros and 45 Corbetts that are not in Wild Land Areas.[10] The wild, rugged and often mountainous terrain of Wild Land Areas offer people who live locally, and those who are visiting, adventure, a sense of freedom and challenge, they are landscapes that inspire and places where people can experience and connect to nature on a grand scale.

These wild landscapes **add value to the Scottish visitor economy**. According to NatureScot's report *Scotland's People and Nature Survey 2017/18*[11], they pulled in an estimated 13.8 million outdoor visitors during 2017 in which hillwalking or mountaineering was the main activity. An updated version of this publication for 2019/20 reports 11.7 million visitors with hillwalking or mountaineering as their main activity. Data from a 2018 Scottish Government report '*Understanding the Scottish rural economy'*[12] shows 'sustainable tourism' in the Highland Local Authority Area generated £197 million in Gross Value Added to the economy, the largest Gross Value Added amount generated of Scotland's rural Local Authority Areas. Data from overnight visitor spending in 2016 shows the Highlands and Islands received 18% of overall overnight visitor expenditure in Scotland that year, approximately £900 million.[13] From our own experiences, managing some of Scotland's wildest places, we are aware of the growing popularity of Scotland's wildest areas as evidenced by rising visitor numbers at our North West Highland properties as well as Schiehallion in Highland Perthshire.

Wild landscapes also **add value to our wellbeing economy**. People who visit the outdoors feel a multitude of benefits. These benefits apply to people visiting wild landscapes and Wild Land Areas in

[9] Annual Compendium of Scottish Energy Statistics 2020, December 2020 update
[10] Please see Wild Land News June 2020, article by Davie Black
[11] Research Report No. 1062, Scotland's People and Nature Survey 2017/18 – outdoor recreation and health modules
[12] Understanding the Scottish Rural Economy, a Scottish Government Report, February 2018
[13] Tourism in Scotland: The Economic Contribution of the Sector, A report commissioned by the Tourism Leadership Group, April 2018

Scotland as much as they do to people who visit National Nature Reserves or local parks. Respondents to the NatureScot '*Scotland's People and Nature Survey 2019/20*'[14], reported improved physical health (71%), feeling energised and revitalised (69%) and feeling less stressed (75%) as amongst the benefits that access to nature had provided them. These results have been corroborated by research from NatureScot completed in 2020. 1,000 people living in Scotland were surveyed on their relationship with nature during 2020 lockdowns and, of this number, 70% cited health as a motivator for getting outdoors, more than 1 in 3 people mentioned managing stress as a reason for exercising outdoors (35%), 63% said their experiences in nature had helped them de-stress, relax and unwind, and 58% felt energised and revitalised.

Wild Land Areas have huge ecological and community restoration potential

The **ecological potential of Wild Land Areas** is evidenced by restoration projects that are already underway in different parts of Scotland. The Yearnstane project is one such example. Established in 2018 by Eadha and Starling Learning, this project has developed around Waterhead Moor – Muirshiel Wild Land Area, an area of wild land in Scotland's central belt covering 10,000 hectares and spanning three Local Authority Areas (Renfrewshire, North Ayrshire and Inverclyde). This project aims to restore the natural processes to the land for the benefit of wildlife and people. Led by local people and creating opportunities for local people to use their skills, this project is bringing resilience to local communities as well as nature. In the project's own words: '*People are absolutely key to the re-imagining and rewilding of this land. Social problems and adverse deprivation are widespread in the west central belt. …The health and social decline in our communities is mirrored in our degraded landscapes*.'[15]

Wild Land Areas provide sense of place, local identity and cohesion

The community land owning trusts provide some of the best examples of how important **wild nature and natural landscapes can be to providing a sense of place, local identity and cohesion**.

The Knoydart Foundation owns and manages the 17,200 acre Knoydart Estate, supporting 111 residents, at the heart of the 55,000 acre peninsula that includes the Kinlochhourn-Knoydart-Morar Wild Land Area. The remote location of this peninsula and the spectacular wild surroundings are part of what defines what it means to live there.

The four land owning community trusts of Lewis and Harris (The North Harris Trust, West Harris Trust, Urras Oighreachd Ghabhsainn (Galson Estate Trust) and Urras Oighreachd Chàrlabhaigh (Carloway Estate Trust)) also offer examples of local identity arising from a sense of place. The Outer Hebrides, where all four land owning trusts are based are home to three Wild Land Areas: Harris-Uig Hills, Eisken, and the South Uist Hills. The logos of these community trusts include natural features of the land and sea. Logos are a simple statement to the world that reveal identity and association. By choosing to represent features of a natural landscape in their logos these community land owning trusts celebrate the significance of natural landscape as part of their identity and belonging.

[14] Research Report No. 1227, Scotland's People and Nature Survey 2019/20–outdoor recreation, health, and environmental attitudes modules

[15] http://www.eadha.co.uk/projects/351_yearnstane_project

Re-peopling and NPF4

Re-peopling of some of Scotland's most sparely populated areas and the ecological restoration of Wild Land Areas can take place hand in hand. In a paper commissioned by the Scottish Land Commission, *Repeopling Empty Places*, Jim Hunter explains how community land ownership, by creating jobs and affordable housing in fragile rural communities, has been a major driver for re-peopling. The John Muir Trust wholeheartedly supports community land ownership for all the benefits it brings and we advocate that further land reform is the main policy driver through which re-peopling of our most fragile rural communities can be achieved.

Although NPF4 isn't necessarily the appropriate driver for re-peopling, it can potentially identify suitable areas of land where the process could begin. From our own understanding, some Wild Land Areas (particularly those in Sutherland, Caithness, Assynt and the Outer Hebrides) exhibit patterns of historical settlement/land use around the edges and in the lower glens and straths, while others, because of their topography, are uninhabitable. With past land use in mind, we believe that some Wild Land Areas could provide focal areas for repopulating parts of remote rural Scotland, with sensitively designed settlements. We believe that aim is entirely compatible with existing Scottish Planning Policy and NPF3, neither of which constrain the potential for re-peopling, but focus on protecting Wild Land Areas from wind farm development only. **We would suggest revising the wording of these previous policies to recognise that some Wild Land Areas may be able to accommodate sensitively designed affordable housing, local facilities and community renewables projects, while retaining exiting protection from large-scale inappropriate commercial energy projects.**

NPF4 can support the aspiration for re-peopling by recognising that wild landscapes add to the quality of life of people living in rural areas. By contrast, large scale wind farms in Wild Land Areas can be detrimental to re-peopling ambitions as development on an industrial scale, up close, detracts from the sense of tranquillity and wildness that makes these places desirable places to live and visit. Re-peopling policies in NPF4 could succeed by combining policies that recognise the ecological and landscape value of Wild Land Areas with policies that aim to regenerate communities.

Existing community landscape partnerships around Wild Land Areas provide examples of how community-led regeneration can successfully take place around Wild Land Areas. Examples include: the Heart of Scotland Forest Partnership (Breadalbane-Schiehallion Wild Land Area); the Assynt and Coigach Living Landscape Partnership (Wild Land Areas: Quinag, Inverpoly-Glencanisp, Reay-Cassley); the Nevis Landscape Partnership (Rannoch-Nevis-Mamores-Alder Wild Land Area), the Carrifran Wild Wood (Talla-Hart Fell Wild Land Area); North Harris Trust (Harris-Uig Hills Wild Land Area); the Knoydart Foundation (Kinlochhourn-Knoydart-Morar Wild Land Area); and the Yearnstane Project (Waterhead-Moor-Muirshiel Wild Land Area).

We would further suggest **that the biggest obstacle to re-peopling is not the existence of Wild Land Areas,** but rather the potential reluctance of landowners in some of these areas to allow any housing development on their land. While this is not necessarily fully within the remit of the National Planning Framework, identifying re-peopling areas could be – including within some suitable Wild Land Areas – and local and existing legislation around Compulsory Purchase Orders, along with pending legislation on Community Right to Buy for Sustainable Development, may be the most effective mechanism to achieve re-population.

What a new approach for Wild Land Areas in NPF4 could look like

A new approach to Wild Land Areas in NPF4 would make **consultation with local communities on planning proposals likely to affect Wild Land Areas mandatory**. Consultation would ask local people where they think any new development should go, they would cover Local Development Plans and alternative siting and design options. All responses from community consultation would be incorporated in to planning documentation and given a fair weighting in the final planning decision. If a developer is bringing back a development proposal under a new name for a site that was previously refused planning permission this should be made explicit in their communications with the local community and the onus should be on the developer to provide evidence of a material change in circumstances that means the site is being re-considered for planning and how past community concerns are being addressed (e.g. with siting, design, restoration work, surveys).

In addition to the mapping carried out by NatureScot, additional research has mapped land uses and habitats within Wild Land Areas. These could be combined as part of NPF4's new digital spatial data platform. For example, these data sets could be overlaid and layered to show regenerating woodland, nationally important peatland habitat, sites of important cultural heritage, popular walking routes, visitor infrastructure, community assets etc. This data, in map form, would give planners, Local Authorities, individuals, community councils and developers a detailed picture of planning constraints and assets. Using these maps alongside Local Place Plans and Regional Spatial Strategies and a NPF4 that identifies Wild Land Areas as assets, could help direct **the protection and enhancement of the extensive natural capital assets that exist within Wild Land Areas.**

How we envisage this working

The approach in NPF4 could be:

1. Data-led and map-based to enable interpretation as to whether land is appropriate for new built development on a commercial scale. These could provide a visual representation of:

    i. The **42 Wild Land Areas** as representation of the best expression of wildness across Scotland, with the relative wildness gradients shown within and outwith these areas.
    ii. **Sites suitable for renewable energy development** according to NPF4 criteria – e.g. 'on our submission those are sites that are not visible (or have minimised visibility) from within Wild Land Areas'.
    iii. **Healthy, functioning peatlands** that should be fully protected (the carbon stored in Scotland's peatlands is equivalent to 140 years' worth of Scotland's greenhouse gas emissions), and the peatlands with greatest restoration potential that should be protected for restoration (such as the estimated 100,000 ha of forested deep peat due for harvest in the next 10 plus years).
    iv. The actual and potential **natural carbon sequestration value of land** with an accompanying policy that areas of high natural carbon sequestration value should be identified and protected for their carbon and ecological restoration value.
    v. **Community assets** as detailed from Community Plans, community consultation and Local Development Plans – with an accompanying NPF4 policy that places an onus on any developer to gather and collate data on community assets to inform their development's siting and design.

vi. **Cumulative energy development and energy development hotspot** maps showing existing infrastructure – with an accompanying NPF4 policy that favours use of existing infrastructure.

2. The different maps and illustrations would provide layers of detail that would aid decision making and provide an evidence base for a more integrated approach to land uses for multiple benefits (this detail could help inform the development of Regional Spatial Strategies and/or Local Place Plans too).

3. Future-focused scenarios with images that illustrate the ecological restoration potential of landscapes, with accompanying NPF4 policy that requires ecological restoration potential to be factored in when a Planning Authority is considering any change in land use. These could, for example, provide additional data upon which to base conditions on the scale, siting and duration of any proposed development. They could also incorporate community aspirations for land use and community regeneration in and around each of the Wild Land Areas.

4. Developers would still be expected to apply the updated Wild Land Area Impact Assessment guidance. In addition, any new built development on a commercial scale that proceeds in a Wild Land Area would be expected to meet a biodiversity net gain/improvement test in line with NatureScot's recommendation that development of any type achieves ecological connectivity, minimises ecological harm and improves biodiversity (see NatureScot's 'Biodiversity Duty Report 2018-2020' and 'Securing positive effects for biodiversity NatureScot' report 2020, Section 5).

Offer of help

We are happy to help the Scottish Government with any of the above. Please email rosie.simpson@johnmuirtrust.org if you would like to discuss our response, ask us any questions or request our support to develop these points.