

Our Position on Wild Land Areas

This document outlines what we think about Scotland's Wild Land Areas, why we care about them and our positive vision for them.

Trust position

1. Scotland's Wild Land Areas are a vital national asset.¹ They are some of Scotland's finest wild places. Largely undeveloped, these are areas with huge potential for ecological restoration that can counter the impacts of climate change and address the biodiversity crisis.
2. We recognise that not all land within the Wild Land Areas is wild. The descriptions of the Wild Land Areas recognise that land uses within them can include deer stalking, sheep grazing, recreation, nature conservation and fishing.² These are areas of land with tracks, paths, estate lodges; some have settlements and car parks and roads in close proximity. They are areas of land which people living near to may not consider as wild at all. The Trust respects differing viewpoints on the Wild Land Areas but believes that they can nonetheless provide a useful reference for planning decisions and that they can support biodiversity recovery in Scotland.

Why we care/relevance to the Trust

3. Founded in 1983, the Trust takes its inspiration from John Muir (1838-1914), the Scots-born founding father of modern conservation and the global inspiration behind national parks.
4. As well as promoting the many benefits of wildness, we campaign for the protection of wild places and look after some of our most magnificent landscapes across eight locations from the far north west of Scotland to the Scottish Borders.
5. Wild places are a diminishing resource that need to be conserved and enhanced, not least because they contribute to the lives of many people in very specific ways. They inspire people, help people to maintain good physical and mental health, aid recovery from illness, provide places for outdoor recreation and, by attracting paying guests into remote areas, help to sustain rural economies. We exist to help make these connections, to protect the wild places we have, to encourage people to experience wildness at first hand, and work with others to repair and rewild damaged ecosystems.
6. The Trust is committed to partnership working with local communities to further the conservation and protection of wild landscapes. We work in formal partnership with five major community landowners on the Western Isles and West Highlands (Galson Estate Trust; North Harris Trust; West Harris Trust; Assynt Foundation; Knoydart Foundation). We are also in landscape partnerships with multiple community, government and private landowner partners around our properties (Quinag, Ben

¹ NatureScot's Wild Land Areas map and descriptions: <https://www.nature.scot/doc/wild-land-areas-map-and-descriptions-2014>

² Please see NatureScot's website for the Wild Land Area descriptions: <https://www.nature.scot/doc/wild-land-areas-map-and-descriptions-2014>

Nevis and Schiehallion) in addition to working in partnership for the restoration of wild places in the Lake District National Park.

National policy context for Wild Land Areas in Scotland

7. Scotland is famed worldwide for its rugged, scenic grandeur. Whilst not pristine wilderness, Wild Land Areas are one of the country's greatest national assets.
8. In recognition of this, a map delineating 42 Wild Land Areas and covering 20 per cent of Scotland's land mass – well over half the Highland Council land area of the Highlands – was published by the Scottish Government's natural heritage adviser, Scottish Natural Heritage, in 2014.³
9. The Wild Land Areas map has been recognised as the most detailed, sophisticated and rigorous mapping of wild places to be carried out anywhere in the world. There is currently no equivalent map nor explicit policy provision for wild places in other parts of the UK.
10. The map, however, has not been without criticism and does have flaws. It includes some terrain, which some people would not regard as particularly wild or natural; it excludes other terrain, where nature is more intact. A further criticism concerns the process through which the map was drawn up, which involved little consultation with local communities. Some communities and community land interest groups have expressed that the Wild Land Areas map is a block on the approval of developments that might bring economic benefit to them.
11. The incorporation of the map into Scottish Planning Policy in 2014 did provide a brake on the expansion of large-scale development of these areas. Scotland's Third National Planning Framework (a long-term plan for development in Scotland), published in 2014, recognised wild land as a nationally important asset and indicated that Scotland's landscapes merit strong protection. This recognition was also incorporated into Scottish Planning Policy 2, with a spatial framework for development that recognised Wild Land Areas as areas of significant protection, which are 'very sensitive to any form of intrusive human activity and have little or no capacity to accept new development.'⁴ Under Scottish Planning Policy 2, development plans were expected to 'identify and safeguard the character of areas of wild land, as identified on the 2014 SNH map of wild land areas.'⁵
12. A Wild Land Area has never been a statutory designation. Wild Land Areas have not been protected from development to the same degree that Scotland's National Scenic Areas and National Parks are. In the absence of a statutory designation, Scottish Planning Policy 2 had an important part to play in guiding what was appropriate development in wild land.
13. Consultation on Scotland's Fourth National Planning Framework (NPF4, policy that has now replaced Scotland's Third National Planning Framework and Scottish Planning Policy 2) began at the end of 2019. The John Muir Trust's position in response to this consultation was one that recognised the flaws of the Wild Land

³ <https://www.nature.scot/doc/wild-land-areas-map-and-descriptions-2014>

⁴ Scottish Planning Policy 2, paragraph 200. Link to the document in full: <https://www.gov.scot/publications/scottish-planning-policy/pages/3/>

⁵ Scottish Planning Policy 2, paragraph 200

Areas map, respected the reservations towards the map of some Highland communities, but stated ultimately that we wished to see the map retained in the NPF4 to guide planning decisions (particularly the siting of large-scale infrastructure) and protect Scotland's finest wild places. In our consultation response we stated that we were not aware of evidence that the Wild Land Areas map prevents rural repopulation (as some had claimed in their responses), as the drivers for repopulation are more closely associated with land reform and the availability of land for community ownership and housing. The map has never been intended as an outright block on development, and the Trust would support community-scale development in some Wild Land Areas where there is a positive case for the local community.

14. Following consultation, the final NPF4⁶ was approved by Scottish Parliament on 11 January 2023 and enacted on 13 February 2023. This document does not refer to the Wild Land Areas map as a consideration for onshore wind spatial planning policy but does continue to acknowledge Wild Land Areas and the need for impact assessments for any development proposed in these areas.

The future of Scotland's Wild Land Areas

15. Following the publication of the revised NPF4 by the Scottish Government in November 2022 and subsequent approval and enactment of the document by the Scottish Parliament in 2023, the Trust continues to monitor the implications for Scotland's Wild Land Areas.
16. Our focus now is on the implementation of NPF4, in particular, how NPF4 policies are applied for the protection of Scotland's wild places, including Wild Land Areas. We welcome anyone seeking to know more about our views to get in touch directly.
17. We remain interested in the potential of Wild Land Areas to contribute to biodiversity recovery, Scotland's climate change targets and rural repopulation. We would welcome a review of Scotland's 42 Wild Land Areas in collaboration with communities, local councillors, landowners, businesses, environmental NGOs, recreational organisations and academic institutions (e.g. SRUC and UHI) to explore how they might help contribute towards revitalised ecosystems, stronger local economies, repopulation, training and education, and improved health and well-being. We would also welcome Scottish Government funding for a feasibility study, under the auspices of the Scottish Land Commission, to consider if and how parts of the Wild Land Areas that were previously settled could in the future accommodate sensitively designed and sited small scale low carbon eco-villages, connected to nearby ecological restoration projects.

Policy outcomes

18. The Trust hopes to see the following policy outcomes:

⁶ Final Fourth National Planning Framework: <https://www.gov.scot/publications/national-planning-framework-4-revised-draft/>

- a) NPF4 policies are interpreted to give adequate protection to Wild Land Areas from inappropriate, large-scale development.
- b) Local Development Plans recognise wild places and areas of wild land as worthy of protection.
- c) Wild Land Areas are viewed by policy makers as natural carbon assets with vast potential for reducing land-based carbon emissions through landscape-scale restoration of natural processes.
- d) Wild Land Areas are recognised by the Scottish Government for their contribution to multiple public and environmental benefits, including outdoor access and recreation, natural carbon sequestration, biodiversity, water supply and quality, soil health and natural flood defences.
- e) Wild Land Areas continue to be gateways to Scotland's finest landscapes, attracting millions of visitors to Scotland each year with positive impacts for local economies as well as nationally.

Publication approved by Trustees: December 2023
Date last updated: November 2023