

8<sup>th</sup> February 2021

## Mountaineering Scotland comments on the Scottish Government's NPF4 Position Statement

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

We support the proposals for nature-based solutions in the uplands for carbon removal, involving peatland re-wetting and more extensive native tree and shrub growth. We would endorse an expansion of natural tree regeneration without the use of long lengths of tall deer fencing.

We welcome integrated land use and transport initiatives that reduce the need for single car occupancy as people go about their work and leisure activities. Better public transport facilities combined with active travel options in rural Scotland can be of benefit to the mountaineering community, and the environment.

Regarding infrastructure to reduce emissions, Mountaineering Scotland agrees with the need to move to a low carbon economy but does not believe that this transition need be at the expense of Scotland's marvellous mountain landscapes. We support renewable energy developments that are of appropriate location and scale. Our support is conditional upon the retention in NPF4 of Paragraph 28 of Scottish Planning Policy 2014 - "The aim is to achieve the right development in the right place; it is not to allow development at any cost." It is important that other, equally important public benefits are taken into consideration for each proposal coming forward.

We support the intention to update the current spatial framework for onshore wind to continue to protect National Parks and National Scenic Areas, and to ensure that development outwith these areas are demonstrated to be acceptable on the basis of site-specific assessments that take into account any special qualities of the landscape.

### 2. Do you agree with our current thinking on planning for resilient communities?

We generally support policies that help improve health and well-being and strengthen community resilience, along with promoting inclusion and equality and eliminate discrimination. Our specific interests lie with the policy of creating and restoring habitats upstream in catchments. We would endorse policies for ecological networks in the uplands to protect and restore biodiversity and ensure that habitats and species can adapt to a changing climate.

We would support policies for sustainable transport that can reduce the need for single-occupancy car travel in rural Scotland. Better public transport facilities combined with active travel options in rural Scotland can be of benefit to the mountaineering community, and the environment.

### 3. Do you agree with our current thinking on planning for a wellbeing economy?

We generally support policies that recognise the fundamental role that Scotland's natural capital plays in supporting the economy and the aim to achieve sustainable, inclusive growth by protecting and investing in natural assets and supporting the health and wellbeing of communities – communities of interest as well as communities of place may benefit from this.

#### **4. Do you agree with our current thinking on planning for better, greener places?**

We agree with policies of protecting, restoring and enhancing natural and cultural heritage, which should form the foundations of a place-based approach to future development.

We welcome the approach that recognises the fundamental role that a healthy and resilient natural environment plays in supporting Scotland's economy and the health and wellbeing of communities.

We firmly support policies designed to protect and restore Scotland's biodiversity and natural assets and to improve their long-term resilience to the impacts of a changing climate. We agree wholeheartedly with NPF3 in regarding Wild Land Areas as a national asset, and would welcome this statement confirmed in NPF4.

While it is sensible to periodically review policies to examine their effectiveness and relevance over time, we do have reservations about the need for potential policy change for wild land to support the policy for the re-population of rural Scotland.

It is our opinion that re-populating rural Scotland in wild land areas is more aligned the land reform agenda, with housing and other infrastructure needs, mainly in the lower-lying land. It seems unlikely from a development planning perspective that new human settlements will require to go beyond 150-200 metres above the strath or glen floor. Due to topography, much of the Wild Land Areas were uninhabited in the past and may very well remain uninhabitable.

We think it is land management and its implications for extensive upland landscapes which is the key issue for wild land in the re-peopling agenda. This lies closer to the Land Use Strategy and Rural Development policies rather than Development Planning, which should rightly look at windfarms, hydro schemes and hilltracks and other civil engineering proposals. Forestry lies within a different planning and consent system, with the exception of Prior Notification for new tracks and roads.

We suggest that the current wild land policies in Scottish Planning Policy 2014, in paragraphs 200 and 215, allow for appropriate development in places defined as Wild Land Areas. We strongly support the retention of those paragraphs in the new NPF4.

A review of the wild land policies may consider the increasing contribution of wild land to Natural Capital and the associated ecosystem services, for carbon sequestration, water retention and flood alleviation, and recreational and cultural values – 94% of Munros lie within Wild Land Areas. This could reconfirm Wild Land Areas as a national asset.

#### **5. Do you have further suggestions on how we can deliver our strategy?**

No

#### **6. Do you have any comments on the Integrated Impact Assessment Update Report, published alongside this position statement?**

No

#### **7. Do you have any other comments on the content of the Position Statement?**

No, thank you

